



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

ENVIRONMENTAL SERVICES DIVISION  
REGION 7  
25 FUNSTON ROAD  
KANSAS CITY, KANSAS 66115

RECEIVED

JUN 16 1997

RCRA PERMITTING & COMPLIANCE BRANCH  
(RPCB)

JUN 13 1997

MEMORANDUM

SUBJECT: Transmittal of Inspection Report - RCRA

FROM: Dedriel Newsome *Dedriel Newsome*  
Environmental Engineer, ARCM/ENSV

TO: JoAnn Heiman  
Chief, RPCB/ARTD

THRU: Mary Tietjen-Mindrup *Mary Tietjen-Mindrup*  
Chief, Air & RCRA Compliance Branch, ENSV

This memorandum transmits the following compliance monitoring inspection report performed by the Air & RCRA Compliance Branch, Environmental Services Division. This was a Level B multi-media screening inspection.

<u>Facility</u>	<u>EPA ID Number</u>	<u>Activity No.</u>	<u>Potential Areas of Non-Compliance</u>
Monsanto Co. St. Louis, MO	MOD004954111	ANF88	Incompatibles Storage Containment

Attachments



R00105679  
RCRA RECORDS CENTER  
Acc# 12



REPORT OF RCRA COMPLIANCE INSPECTION

AT

MONSANTO COMPANY  
J F Queeny Plant  
1700 South Second Street  
Saint Louis, Missouri 63104

EPA ID Number: MOD004954111

ON

May 20, 1997

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY  
Region VII  
Environmental Services Division

INTRODUCTION

At the request of the Air, RCRA, and Toxics Division (ARTD), a RCRA compliance evaluation inspection was performed at Monsanto Company located in St. Louis, MO on May 20, 1997. The inspection was conducted under the Resource Conservation and Recovery Act (RCRA), as amended. This report and attachments present the results of the RCRA inspection. This inspection was a Level B Multi-media screening inspection. The multi-media screening checklist is included as Attachment 1.

PARTICIPANTS

Monsanto Company:

Robert Cheever, JFQ and Solid Waste Superintendent  
Rich Koenig, Senior Environmental Technician

U.S. Environmental Protection Agency (EPA):

Dedriel L. Newsome, Environmental Engineer

INSPECTION PROCEDURES

Upon arrival at the facility, I met Mr. Cheever and Mr. Koenig. I explained the purpose and procedures of the inspection and presented Mr. Cheever my EPA credentials. Mr. Cheever was provided with the Confidentiality Notice which he signed as

acknowledgment of receipt (Attachment 2). Mr. Cheever was provided with a copy of U.S. Federal Code 1001 concerning false statements. During the inspection, discussions consisted of facility operations, wastes generated and waste management practices. I conducted a visual inspection of the facility and was accompanied by Mr. Koenig and Mr. Cheever. At the conclusion of the inspection, the findings and recommendations were summarized with Mr. Cheever and Mr. Koenig. Mr. Cheever was provided with a Request for Confidential Treatment form, a Document of Receipt and a Notice of Violation (NOV) which he signed as acknowledgment of receipt, see Attachments 3 through 5.

#### FACILITY DESCRIPTION

Monsanto is an industrial chemical manufacturer. They manufacture Duralink® (chemical added to tires to increase the life of the rubber), L-aspartic acid (chemical used to produce NutraSweet®), and maleic anhydride briquettes. Monsanto repackages hydraulic fluid into 55, five and one gallon size and quart size containers in their Central Drumming unit. They also conduct research at a small research and development (R&D) pilot plant. There is a utility unit on-site which includes the wastewater pretreatment (WWPT) system. Process diagrams or descriptions of these production units are included in Attachment 6. Monsanto also has a laboratory that is used for quality control and a maintenance shop that is used for equipment, building and forklift maintenance.

Mr. Cheever stated that Monsanto will be separating their life sciences companies from their chemical companies. This will become effective sometime on or before 9/1/97. A pilot on this separation will begin on 7/1/97. Due to this separation, the company's name will be changing, although to what, is currently not known. Also, Monsanto will be changing their contingency plan. Currently, they are operating under the contingency plan that is in their Part B Application.

I visually inspected the hazardous waste container storage pad and the satellite accumulation containers in the following areas: canning in Central Drumming, Tank Unloading area in canning, PA Bldg. (Duralink®), Warehouse, Maintenance Shop, and Laboratory.

Monsanto has 113 employees and operates three shifts, seven days a week. A layout of the facility is shown in Attachment 7. Mr. Cheever drew a thick line around their property on the layout

to show what area and buildings they own. Monsanto is primarily operating in the central part of their property. Since the previous inspection conducted on 12/1/93 by MDNR, Monsanto sold their lab building to AMJ Enterprises and moved the lab into another building on-site. Therefore, they no longer accumulate their laboratory hazardous spent solvent in a tank prior to transferring it to drums. They also ceased manufacturing para-Nitrophenetole about two years ago.

## Wastes

### 1. Types of Hazardous Waste and Generation Rates

Many different types of waste streams are generated from each production unit and throughout the plant. The specific ones that were generated during 1996 from each production unit and plant wide are shown in Attachment 8. Also, the type of waste that was generated and manifested off-site during the last quarter is shown in Attachment 9. The specific waste that was in storage at the time of the inspection is shown in Attachment 10. More specific comments on some of the wastes that are generated on-site follows:

a. R&D Pilot Plant - Monsanto's pilot plant takes bench scale tests and tries them on a larger scale. This plant is operated at various times during the year. It generates many different types of hazardous waste depending on the type of R&D. Mr. Cheever stated that primarily any waste generated from this plant is sent off-site to Rollins for incineration. He also stated that acetone is used as the universal cleaning solvent in this plant.

b. Production Units - There are several general waste streams that are generated at all the production units. Dry floor sweepings are generated from sweeping inside the production unit's buildings. They are collected in drums and disposed of through Rollins. Areas on the outside in the production units are washed down with water which drains to the WWPT system. Personal protective gear may also be generated in the various production units and is collected in drums for disposal through Rollins.

c. Utility - All process wastewaters and storm waters are neutralized on-site in the WWPT system prior to being discharged to the Metropolitan POTW, for which Monsanto has a permit. Mr.

Cheever stated that there are no sludges generated as wastewaters are only neutralized.

d. Laboratory - The laboratory spent solvent is accumulated in small containers and then transferred to a 55-gallon drum at the lab. The full drum is then transferred to the hazardous waste container storage pad. Samples are returned to the process if possible. If the sample is a finished good, it remains in the lab and is lab packed for off-site disposal when the lab is purged at least once a year, according to Mr. Cheever. The laboratory wastewater drains to the WWPT system.

e. Drum Washing - Three to four times a year when approximately 100 empty drums are accumulated, Monsanto contracts with TriRinse, St. Louis, MO, to rinse these drums. TriRinse rinses the empty drums with a caustic rinse water solution in a drum cleaning unit they bring on-site. The rinsate is collected on-site and disposed of by Rollins and the clean drums are then crushed.

## 2. On-Site Management

According to Mr. Cheever and Mr. Koenig, hazardous waste is accumulated in containers. After the containers are full, they are transferred to the hazardous waste storage pad until manifested off-site. While reviewing the manifests, I noted that there were some bulk shipments of hazardous waste manifested off-site, such as the 33,300 pounds of sulfuric acid recently sent off-site. I asked Mr. Koenig where the bulk wastes are stored prior to shipment. He stated that in those cases, the waste is collected from the generation point without storage. He stated that they do not accumulate hazardous waste in tanks prior to off-site shipment.

## 3. Disposal

Monsanto has a corporate contract with Rollins to handle all the Monsanto facilities waste, primarily for incineration, see Attachment 8. Some waste may be sent to a hazardous waste landfill or a recycler depending on the type of waste (solid versus liquid, etc.). Therefore, most all the Queeny Plant hazardous waste and most non-hazardous waste (including aerosol cans and waste oil) are handled by Rollins for incineration. Some sulfuric acid was manifested to DuPont Company, Deepwater, NJ, for treatment and then discharged under a NPDES permit. The lead/acid and nickel cadmium batteries are sent to Allworth,

Inc., Mt. Pleasant, TN, for recycling. Other non-hazardous wastes that are not sent to Rollins for incineration include the wastewaters (discussed below), sodium thiosulfate dust generated in the Duralink® production unit, fluorescent light bulbs and general trash. The sodium thiosulfate dust, see Attachment 6-1, is recycled on-site or disposed with the general trash. The fluorescent light bulbs are manifested to Recyclights, Bloomington, MN, for recycling.

## FINDINGS AND OBSERVATIONS

### 1. RCRA Status

Monsanto notified as a large quantity generator (LQG) of many different types of hazardous wastes. Based on Monsanto's generation rates, they were inspected as a LQG, see Attachment 10.

Monsanto had a RCRA permit for container and tank storage and incineration. They no longer operate these permitted units and they have been certified as closed. A part of that permit was a corrective active permit with EPA which is still active. None of these corrective action items were reviewed during this inspection as EPA conducted a corrective action inspection during the previous week.

### 2. Incompatibles

Monsanto has one waste container storage pad that is used as a less than 90 day storage area. They no longer store waste over 90 days. This pad has only one containment area and no dividing berms. All of the containerized hazardous waste generated on-site is stored on this pad until manifested off-site. Monsanto generates many different types of hazardous waste as discussed above. Some of these waste would be potentially incompatible, such as the acids and bases and the corrosives and halogenated solvents according to 40 CFR Part 264 Appendix V. According to the inventory logs (see Attachment 11-1 through 11-3) reviewed at the time of the inspection, incompatibles were previously stored on the storage pad as follows:

WASTE	QUANTITY (DRUMS)	DATE PUT IN STORAGE	DATE REMOVED FROM STORAGE
Sodium Hydroxide, D002	6	2 - 4/18/96 4 - 4/24/97	5/8/96
Potassium Hydroxide, D002	6	4/22/96	5/8/96
Acetic Acid, D002	26	5/6/96	5/8/96

Based on this information, it appears that these acid and base incompatibles were stored for only two days.

The container inspection log that is used by Mr. Koenig shows that incompatibles are to be checked, see Attachment 12. However, Mr. Koenig, who conducts the inspections, stated that incompatible over packs would only be used if there was something "really bad" and that it was a judgement call. He stated that if it did not appear that the waste would eat through the drum, then the over packs were not used. According to the 1996 and 1997 inspection logs, there were no incompatible over packs that were used. I asked Mr. Koenig if this was actually the case and he stated that they did not use any over packs during that time. I asked Mr. Koenig if the drums on manifest #96045 (Attachment 11-3) had a pH of below 2 and above 12.5. He stated that they did, but they were not pure chemicals as they were rinse waters and would not eat through the plastic drums. He stated that this is why they were not separated.

After the inspection, I reviewed the additional inventory forms that were provided to me and some additional incompatibles were noted as follows:

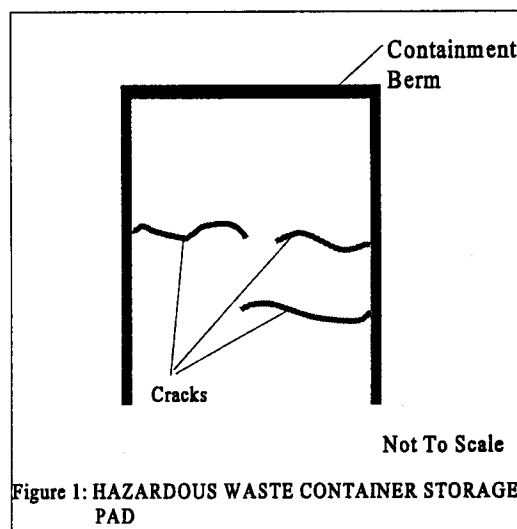
WASTE	QUANTITY (DRUMS)	DATE PUT IN STORAGE	DATE REMOVED FROM STORAGE
TEA/HCC Solution, D001/D002 (triethylamine,hydrochloric acid)	2	2/11/97	2/20/97
TBAA Mother Liquor, D001/D002 (cyclohexane,hydrochloric acid)	1	2/11/97	2/20/97
Potassium Hydroxide Wash, D002	12	2/11/97	7 - 2/20/97 5 - 3/13/97
Maleic Anhydride, U147	1 2 1 2	1/21/97 1/28/97 2/3/97 2/11/97	2/20/97
NC-45 Mother Liquor, D002 (potassium hydroxide)	1	2/11/97	3/13/97
Caustic Rinse Water, D002 (sodium hydroxide)	6	3/6/97	3/13/97

The above incompatible relationships were identified using 40 CFR 264 Appendix V and the TOMES Chemical Database, see attachment 11-4 through 11-8. Storing incompatibles is in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.177(c).

There were two containment pallets stored next to the container storage pad. I asked Mr. Koenig when these two pallets were used. He stated that they were used when extra storage area was needed. He stated that they were primarily used when they had the tank at the old lab building (which has been sold to AMJ Enterprises).

### 3. Containment Cracks

The less than 90 day storage pad is used to store and was storing at the time of the inspection over 1000kg of liquid hazardous waste, see Attachment 10 and photo 1. I observed cracks (mainly three) noted in the containment pad as shown in Figure 1 and photos 2 through 5. According to 10 CSR 25-5.262(2)(C)2.B.(III)(a), the containment area should be free of cracks. I asked Mr. Koenig if they have ever done anything to these cracks and he stated that they have not. He stated that they do check weekly for cracks when they do their weekly container inspections. No notations of cracks were made on the 1996 and 1997 inspections logs. I asked Mr. Koenig why there was not anything done to these cracks and he stated that he did not know.



### 4. Sump

At the time of the inspection, the containment sump was about half full with water. According to Mr. Cheever, it rained Sunday night. I asked when they normally remove water from the containment sump. Mr. Cheever and Mr. Koenig stated that they usually do not remove the water until the sumps fills up. At other times, the water stays in the sump and evaporates. I informed them that according to 10CSR 25-5.262(2)(C)2.B.(III)(e), the accumulated liquids are to be removed to prevent overflow of the containment. Mr. Cheever and Mr. Koenig stated that they would start removing the water. This was inadvertently not listed on the NOV, but was discussed during the inspection.

## 5. Miscellaneous Items Discussed

### a. Spent Methanol Recovery

There is an inline still in the Duralink® production unit that is used to regenerate spent methanol (contaminated with water). There are two tanks (1000 and 3000 gallons) prior to the still that are used to store the spent methanol (F003/D001) prior to reclaiming. The recovered methanol is reused in the process, see Attachment 6-1. The Duralink® production unit is only operated seven months out of a year and is shut down the remaining part of the year. When the plant is shut down, the tanks are emptied according to Mr. Cheever and Mr. Koenig. According to 40 CFR 261.4(a)(8), the spent methanol would be exempted since only tank storage is involved, reclamation does not involve controlled flame combustion, the waste never remains in the tank over 12 months, the reclaimed material is not used to produce a fuel or used in products that are applied to the land and the reclaimed material is returned to the original process. Therefore, it appears that the spent methanol storage tanks would not be RCRA regulated.

### b. Railcar Storage

Some of the maleic fines (U147) from the maleic briquette process may not be sent directly to the re-melt tank for re-use. As shown by the process diagram in Attachment 6-3, some may be accumulated over a year in a railcar prior to being reclaimed in the process. However, commercial chemical products that are accumulated speculatively are not solid waste.

## 7. Other Generator Requirements

The other generator requirements were reviewed and no apparent violations were noted as shown in the checklist included as Attachment 13. In regard to Subpart CC, Monsanto uses containers over 26 gallons for volatile organics, however they are all DOT approved for packaging and transporting hazardous waste. This is a Missouri state requirement for storage containers of hazardous waste.

Dedriel Newsome

Dedriel L. Newsome

Environmental Engineer

Date: 6/8/97

Activity Number: ANF88

Attachments

1. Multi-Media Inspection Screening Checklist (2 pages)
2. Confidentiality Notice (2 pages)
3. Request for Confidential Treatment
4. Document of Receipt
5. NOV
6. Process Diagrams and Descriptions (7 pages)
7. Layout
8. 1996 Generated Waste (9 pages)
9. 1997 First Quarterly Report (19 pages)
10. Inventory (8 pages)
11. Incompatible Documentation (8 pages)
12. Inspection Log
13. Checklists (9 pages)

Photo Log

Photographs (2 page/5 photos)

# REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility: Monsanto J.F. Queeny  
 Address: 1700 S. 2<sup>nd</sup> St  
St. Louis, MO 63104  
 County: St. Louis City Section: N/A  
 Township: N/A Range: N/A

Facility Ownership: Monsanto Inspector: Dedrie Newsome  
 Facility Contact: Bob Cheever Primary Media: RCRA  
 Phone: (314) 622-1641 SIC code: 286942899 Date: 5/20/97  
 Net Annual Sales Volume at that Location (\$): unknown  
 Number of Employees: 113 Work Schedule/Hrs: 24 hrs / 7 days/week

- Does the facility have permits or registrations in any of the following areas? [F=Federal, S=State, L=Local]  
 ( ) CWA: L Pretreatment, NPDES, 404-Wetlands ( ) UIC ( ) UST ( ) PWS ( ) RCRA ( ) TRI (S) CAA ( ) Other  
 Describe: \_\_\_\_\_
- What are the business, manufacturing or service activities at the facility? Industrial Chemical manufacturer - Auralink®  
L-aspartic acid, maleic briquetting, repackaging hydraulic oil
- What raw materials and fuels are used by the facility? many, see Attachment 1 for raw materials;  
gasoline
- Provide brief process description: see #2

- What major process operations are used? (✓) blending (✓) mixing (✓) reacting (✓) distilling (✓) filtering (✓) separating  
 ( ) formulating ( ) degreasing: water based, halogenated solvent based, non-halogenated solvent based ( ) combustion  
 ( ) coating: water based, solvent based ( ) machining ( ) fabricating ( ) assembly ( ) printing (✓) laboratory analysis  
 ( ) electroplating: chrome ( ) electroless plating ( ) Other \_\_\_\_\_

Provide a general description of the wastes generated by the facility:				Is Waste Hazardous?		
Waste Stream Name	Generation Process	Quantity Per/Month	Final Disposition of Waste	No	Yes	Don't know
(see Attachment 2)				( )	( )	( )
Handled by				( )	( )	( )
Rollins Env. Services				( )	( )	( )
				( )	( )	( )
				( )	( )	( )
				( )	( )	( )

- Description of surrounding area (access to children, public, economic condition): (✓) Industrial (✓) Business ( ) Residential ( ) Rural  
 Potential environmental issues: \_\_\_\_\_

**NPDES** - National Pollution Discharge Elimination System. **PWS** - Public Water Supply. **UIC** - Underground Injection Control. **WETLANDS**

1. Where do the facility's wastewaters go?	None	Treatment	Municipal Sewer	Septic	Injection Well	Surface Water	Storm Sewer	Land
(✓) Yes Process Wastewaters	( )	( )	(✓)	( )	( )	( )	( )	( )
(P) Permitted Non-Contact Wastewaters	( )	( )	(✓)	( )	( )	( )	( )	( )
(?) Don't know Sanitary Wastewaters	( )	( )	(✓)	( )	( )	( )	( )	( )
Other _____	( )	( )	( )	( )	( )	( )	( )	( )

Comments: \_\_\_\_\_

- Did you observe any wastewater discharges not mentioned above? (✓) No ( ) Yes Location of discharge: \_\_\_\_\_  
 Appearance of discharge: \_\_\_\_\_

- Where does the facility get its: Process water? ( ) City/Rural district ( ) Private well ( ) Pond ( ) River ( ) Other \_\_\_\_\_  
 Drinking water? ( ) City/Rural district ( ) Private well ( ) Pond ( ) River ( ) Other \_\_\_\_\_

Is public water source protected by backflow prevention device? ( ) No (✓) Yes ( ) Don't know

- What is the source of drinking water for the area around the facility? ( ) Rural ( ) Municipal source ( ) Private well ( ) Don't know

- Are there any surface water bodies (ponds, streams, lakes, rivers) or temporarily wet areas that have been disturbed (filling, waste disposal, ditching, excavation, damming, dredging, etc.)? (✓) No ( ) Yes ( ) Don't know

Describe/locate: \_\_\_\_\_

## CAA - CLEAN AIR ACT

- Are there any non-steam/water vapor, visible smoke or dust emissions? ☒ No ☒ Yes Source: \_\_\_\_\_ Time: \_\_\_\_\_
- Are there any fugitive emissions? ☒ No ☐ Yes Leaving property? ☒ No ☐ Yes Source: \_\_\_\_\_ Time: \_\_\_\_\_
- In the past 2-3 years, has the facility modified or installed any new air emission points? ☐ No ☒ Yes  
Describe: Process Vents, Storage Vents
- Are the facility's air conditioning, refrigeration, or motor vehicle air conditioning systems: ☐ Self-served? ☒ Contract Serviced? ☐ Both?  
Do the units contain: ☒ <50lbs. And/or ☒ > 50 lbs. of refrigerant? Service Company Name: Willen Refrigeration

## RCRA - RESOURCE CONSERVATION AND RECOVERY ACT & UST's - UNDERGROUND STORAGE TANKS

- Does the facility conduct or have any of the following on-site waste management activities? ☐ Treatment ☐ Burning ☐ Landfills  
☐ Surface impoundments ☒ Storage ☒ Recycling - Are recyclables stored more than one year? ☒ No ☐ Yes
- Is a wastewater sludge generated? ☒ No ☐ Yes Is it hazardous? ☐ No ☐ Yes ☐ Don't know  
Where does the sludge go? ☐ Hazardous waste disposal site ☐ Off-site landfill ☐ On-site landfill ☐ Land applied
- Does the facility generate used oil? ☐ No ☒ Yes Are the containers labeled "Used Oil"? ☐ No ☐ Yes Handled as a hazardous waste
- Did you observe any hazardous waste containers or tanks which were leaking, open, or not labeled? ☒ No ☐ Yes  
Describe: \_\_\_\_\_
- Are there any signs of <sup>new</sup> past spills or releases (dead/stressed vegetation, stains, discoloration)? ☒ No ☐ Yes  
Describe: Going thru corrective action
- Does the facility have any underground storage tanks that contain petroleum products? ☒ No ☐ Yes
- Do any of the chemical, industrial, or hazardous waste handling procedures concern you? ☐ No ☐ Yes  
Describe: (see RCRA report) incompatibles, cracked haz wst containment

## TITLE III - EPCRA - EMERGENCY PLANNING AND COMMUNITY RIGHT TO KNOW ACT & SECTION 5 TSCA - TOXIC SUBSTANCES CONTROL ACT

- Have Toxic Chemical Release Forms (Form R's) been submitted under Section 313 of EPCRA? ☐ No ☒ Yes [must have > 10 employees]
- Have hazardous chemical inventory forms (Tier II forms) ever been submitted under Section 312 to local Emergency Planning Committees or fire department? ☒ Yes ☐ No If no, describe gross storage volumes, and type of chemicals stored: \_\_\_\_\_
- Does the facility import or manufacture a chemical substance? ☐ No ☒ Yes  
Describe type and intended use: \_\_\_\_\_

## PCB's - POLYCHLORINATED BIPHENYLS & SPCC - SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

- Does facility have any equipment in service that contains PCB's at >500 ppm, that is leaking or not labeled? ☒ No ☐ Yes ☐ Don't Know
- Does facility have any equipment in storage that contains PCB's at >50 ppm, that is leaking or not labeled? ☒ No ☐ Yes ☐ Don't know
- Does the facility have above ground tanks that store petroleum, synthetic, animal, fish, or vegetable oil, in a single tank > 660 gallons or tanks with an aggregate volume > 1320 gallons, that are or show evidence of recent leaks into waters of the state? ☐ No ☒ Yes  
Describe: Have a tank farm, oil storage, gasoline (volume unknown) at time

## FIFRA - FEDERAL INSECTICIDE, FUNGICIDE, AND RODENTICIDE ACT

- Does the facility manufacture, repackage, or apply pesticides? ☒ No - STOP HERE ☐ Yes  
Are rinsates handled in an environmentally sound manner? ☐ No ☐ Yes Describe: \_\_\_\_\_
- Do workers use personal protective equipment (gloves, long sleeve shirts, coveralls) when mixing/loading? ☐ No ☐ Yes  
Describe: Maintain their registration, but don't currently do. Keep for flexibility  
Please note any photo's taken to document potential problems.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
CONFIDENTIALITY NOTICE

Facility Name <b>Monsanto, J.F. Queeny Plant</b>	
Facility Address <b>1700 South 2<sup>nd</sup> St. St. Louis, MO</b>	
Inspector (print) <b>Dedriel Newsome</b>	Title <b>Env. Engineer</b>
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	
Date <b>5/20/97</b>	

It is possible that the United States Environmental Protection Agency (EPA) will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the applicable statute under which the information is obtained. EPA is required to make inspection data available in response to FOIA requests, unless the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial or financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information.

To claim information confidential, you must certify that each claimed item meets all of the following criteria (40 CFR 2.208):

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtained without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

In addition, within fifteen (15) calendar days of the claim, you must provide written comments in support of the claim, based on factors listed in 40 CFR 2.204(e)(4). This statement should be mailed by registered, return-receipt requested mail to the Inspector at the address listed above. Failure to submit comments by this deadline will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

At the completion of the inspection, you will be given a receipt for all materials collected. At that time you may make claims that some or all of the information is confidential and meets the criteria listed above.

U.S.EPA INSPECTION CONFIDENTIALITY NOTICE (cont.)

Facility Name
Monsanto, J.F. Queeny Plant
Facility Address
St. Louis, MO

If you are not authorized by your company and there is no one on the premises of the facility who is authorized to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the authorized representative designated below.

Authorized Representative \_\_\_\_\_

Title \_\_\_\_\_

Address \_\_\_\_\_

If the authorized representative listed above requests confidential treatment, they must return a statement specifying any information which should receive confidential treatment and written comments in support of the claim based on factors listed in 40 CFR 2.204(e)(4).

This statement from the authorized representative should be mailed by registered, return-receipt requested mail within fifteen (15) calendar days of receipt of the Confidentiality Notice to the Inspector at the address listed on page 1.

Failure to submit confidentiality claims and comments within the fifteen (15) day period will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

=====

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

Facility Representative Provided Notice (print)	Title
ROBERT L. CHEEVER	JFQ and SOLID WASTE Supt
Signature/Date	
Robert L. Cheever	5/20/97

(rev:1/20/93)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name <u>Monsanto - Queeny Plant</u>
Facility Address <u>St. Louis, MO</u>

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☒

Split Samples: YES ☐ NO ☒

Documents/Samples were: 1) Received no charge ☐ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$  Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

Facility Layout  
Process Diagrams (7 pgs)  
Waste Streams (10 pgs)  
Drum Inventory (10 pgs)  
Manifest  
3/31/97 Audit Report (19 pgs)  
Inspection Log

Facility Representative (print) <u>ROBERT L. CHEEVER</u>	Signature/Date <u>Robert L. Cheever 5/20/97</u>
Inspector (print) <u>Dedriel Newsome</u>	Signature/Date <u>Dedriel Newsome 5/20/97</u>
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	

(rev:1/20/93)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REQUEST FOR CONFIDENTIAL TREATMENT

Facility Name	Monsanto - Queeny Plant
Facility Address	St. Louis, MO

Information for which confidential treatment is requested:

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the applicable statute under which the information is obtained. The undersigned further acknowledges that they are authorized to make such claims for their firm.

The undersigned also certifies that each claimed item described above meets all of the following criteria (40 CFR 2.208):

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtained without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

In addition, within 15 days of your claim, you must provide written comments in support of the claim, based on factors listed in 40 CFR 2.204(e)(4). Failure to submit comments by this deadline will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

Authorized Representative (print)	Signature/Date
ROBERT L. CHEEVER	Robert L. Cheever 5/20/97
No confidential treatment claimed during the inspection: <u>RLC</u> (Facility Representative's initials)	
Inspector (print)	Signature/Date
Dedrie / Newsome	Dedrie Newsome 5/20/97
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	

**Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA)**

TO: Facility Name: Monsanto Queeny Plant  
Address: 1700 S. Second Street  
St. Louis, MO 63177-7040  
EPA ID Number: MDD004954111 Date: 5/20/97

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

<u>Citation</u>	<u>Description of Violation</u>
<u>1. 10 CFR 255.262 (1) inc</u> <u>46 CFR 262.34 (a)(1) m</u> <u>40 CFR 265.177 (c)</u>	<u>Separate incompatibles in &lt; 90 day</u> <u>storage area</u>
<u>2. 10 CFR 255.262 (2)</u> <u>(c) 2 B (111)(a)</u>	<u>Containment system cracked</u>

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The Monsanto Queeny is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to: Ed Buckner, Chief, RCRA Branch, U. S. Environmental Protection Agency, Region VII, 726 Minnesota Ave., Kansas City, Kansas, 66101. The corrective actions taken by Monsanto Queeny will be considered in subsequent enforcement follow-up. Should civil penalties be assessed, corrective action(s) will be considered in assessing the penalty amount.

If you have any questions on this Notice or wish to discuss your response, you may call Ed Buckner (U. S. EPA) at (913) 551-7621, or \_\_\_\_\_, at \_\_\_\_\_.

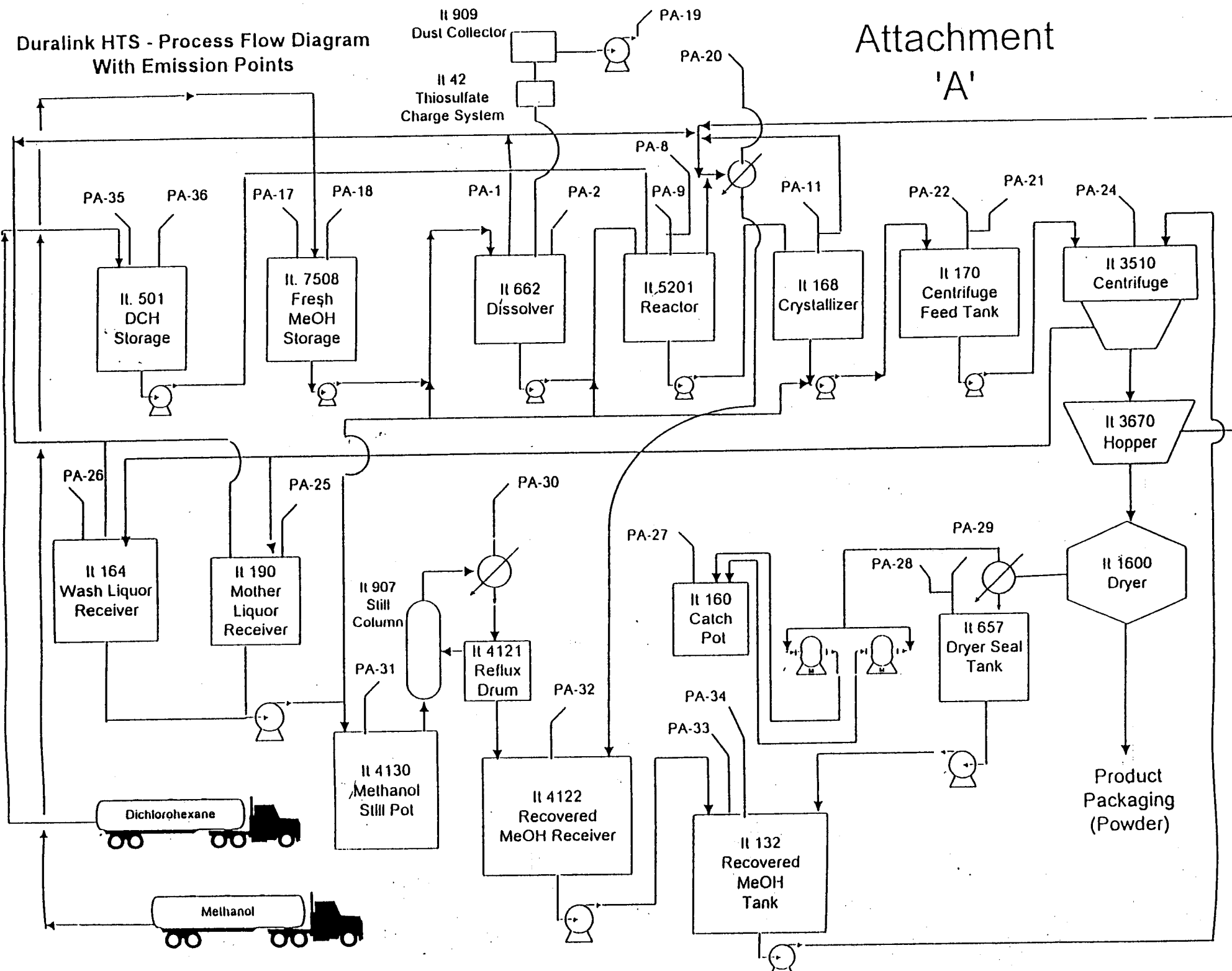
This Notice prepared by Dedriel Newsome Date: 5/20/97

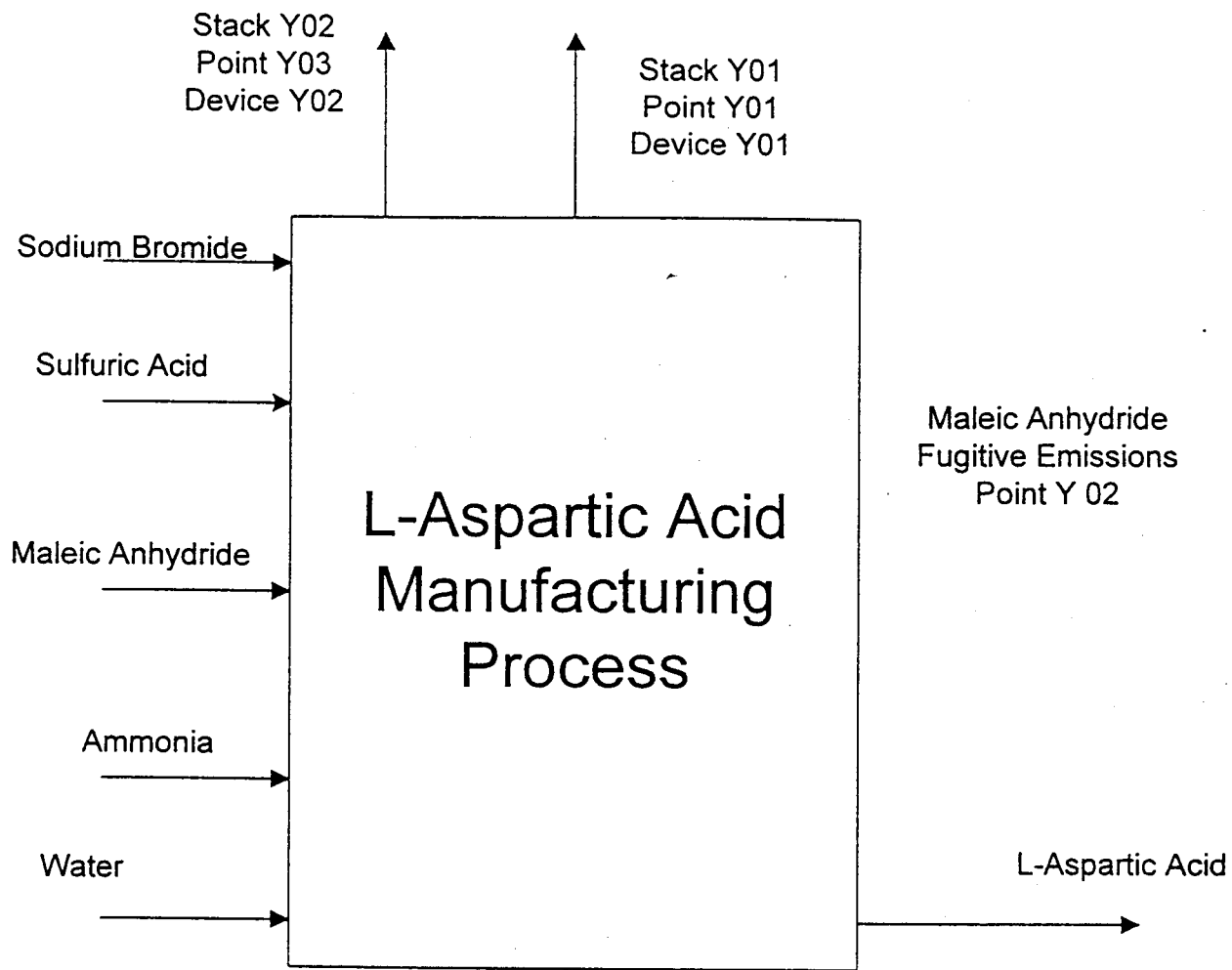
The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: ROBERT L. CHEEVER Date: 5/20/97  
Signature: Robert L. Cheever  
Title: JFQ and Solid Waste Dept.

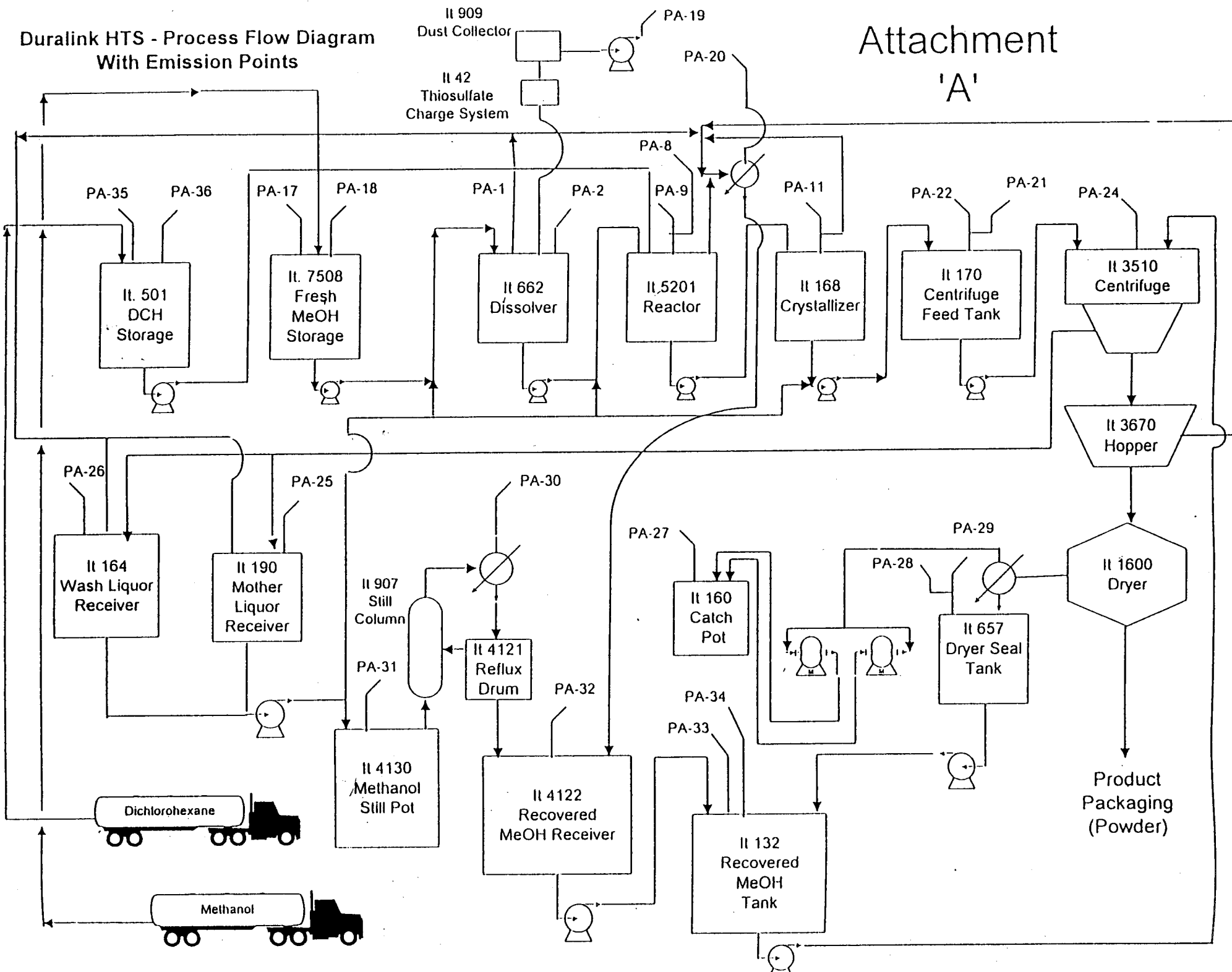
**Duralink HTS - Process Flow Diagram  
With Emission Points**

Attachment  
'A'





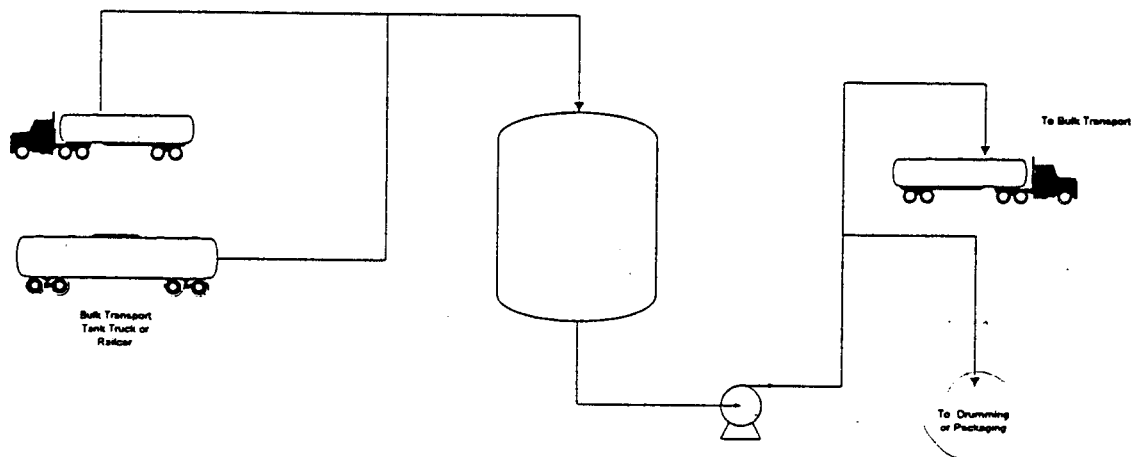
Attachment  
'A'



## CENTRAL DRUMMING PROCESS DESCRIPTION

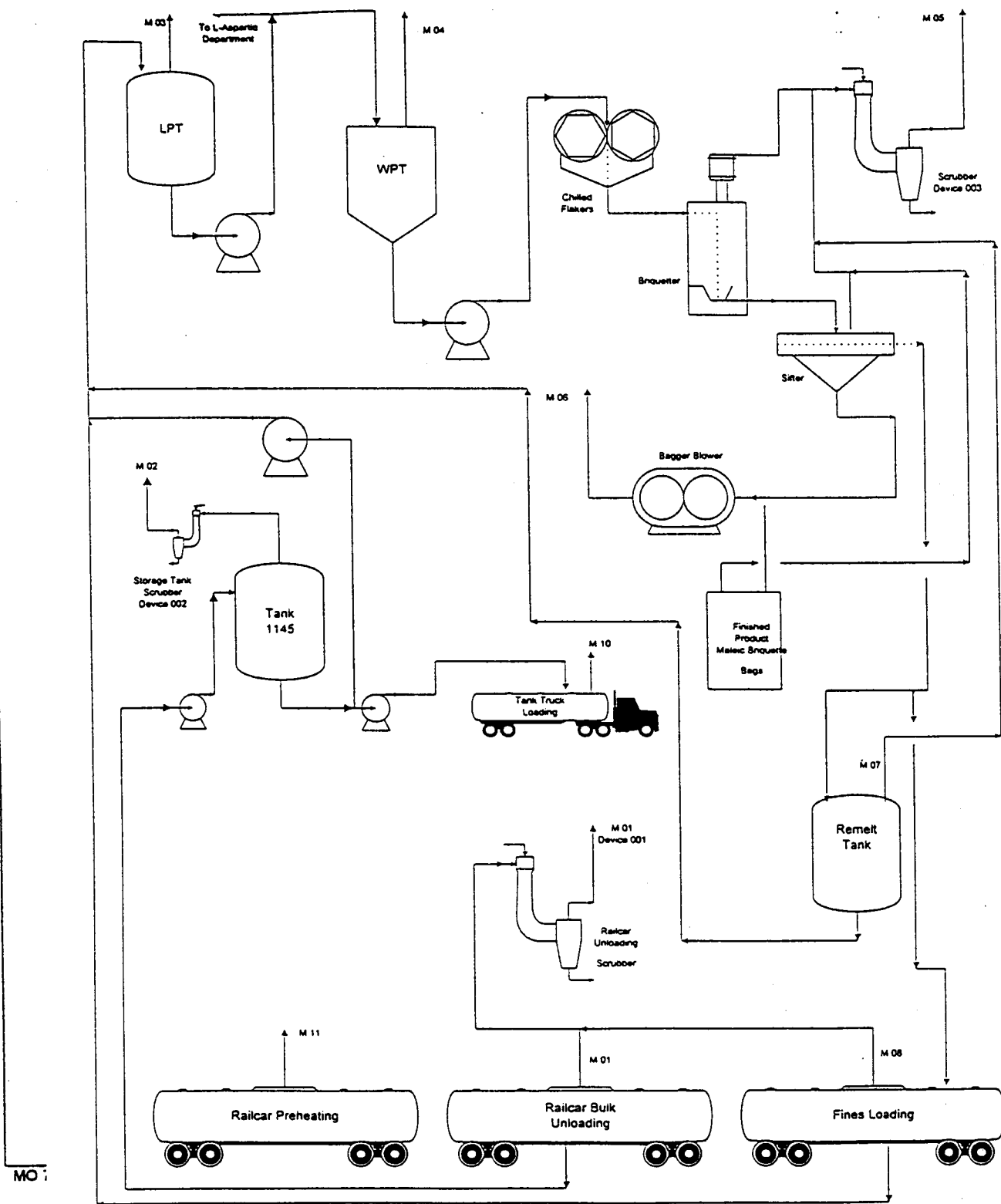
The Central Drumming Department handles various plasticizers, polymer modifiers, heat transfer fluids, and hydraulic fluids in transfer or blending operations. There are 24 storage tanks in the department, and each is then transferred or blended in bulk or drum containers. As the Central Drumming operations do not entail any chemical reactions, the flow diagram would be best shown as below.

### Central Drumming Operations



MO 780-1431 (12/96)

Duplicate this form as needed.

[illegible]

## Maleic Briquette Process

## PROCESS DESCRIPTION FOR UTILITIES

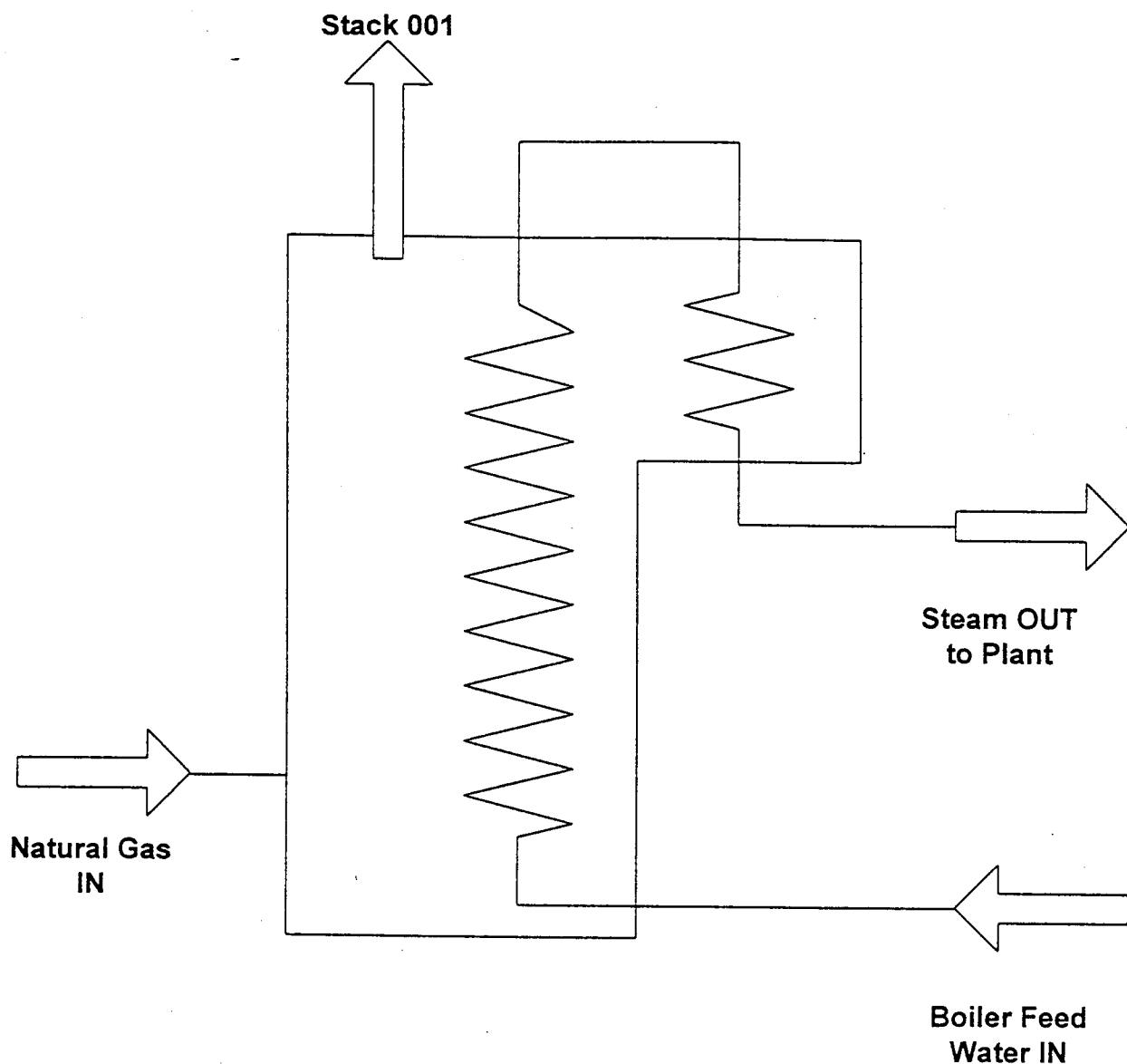
Monsanto-John F. Queeny uses lime for neutralization in its waste water pretreatment facility, prior to discharge to the Metropolitan St. Louis Sewer District. The lime is stored in a silo, prior to its use. Additionally, there are also secondary emissions from the waste water pretreatment neutralization system.

Monsanto-John F. Queeny also use gasoline and diesel fuel for various vehicles used throughout the facility, including fork lift trucks and maintenance trucks. Additionally, diesel fuel is used to run fire protection system booster pumps.

Monsanto-John F. Queeny has a cooling tower which provides chilled water throughout the facility. Additionally, there is a cooling tower that provides chilled water for the multi product facility, PA Building.

## PROCESS DESCRIPTION FOR RESEARCH PILOT PLANT FACILITY

At Monsanto-John F. Queeny Plant there is a small scale research and development pilot plant which produces small quantities of proprietary research material for product evaluation. The pilot plant will have several processes throughout the year, operate in WW Building.



## PACKAGE BOILER # 2

Emission Point  
002



## 96WASTE

1996 DURALINK WASTE MATERIAL						
	TYPE		# OF		EPA CODE	
MATERIAL	TREAT.	HAZ.	DRUMS	LBS.		OTHER
CAUSTIC RINSE WATER	INC	Y	6	2,991	D002	
DRUM RINSE WATER	INC	N	4	1,915		
DURALINK METHANOL/WATER	INC	Y	2	892	D001	
DURALINK SALT FILTER MATERIAL	INC	N	1	235		
DURALINK WATER FILTERS	INC	N	3	246		
DURALINK WET CAKE	INC	N	37	14104		
DURALINK	INC	N	1	180		
LAB GLASS JARS	INC	N	1	330		
PROTECTIVE GEAR	INC	N	2	64		
ZORBALL/DURALINK	INC	N	1	410		
TOTAL			58	21,367		

## 96WASTE

1996 LAB WASTE MATERIAL						
	TYPE		# OF			
MATERIAL	TREAT	HAZ.	DRUMS	LBS.	EPA CODE	OTHER
CONTAMINATED LAB MATERIAL	INC	N	5	601		
DURALINK	INC	N	4	480		
FEES						
L-ASPARTIC ACID	INC	N	2	437		
LAB CRUSHED GLASS	LF	N	3	5,754		
LAB SOLVENTS	INC	Y	18	7,663	DOO1,DO22,FOO3,FOO5	
MALEIC ANHYDRIDE	INC	Y	32	4,424	U147	
TOTAL			64	19,359		

## 96WASTE

1996 CENTRAL DRUMMING WASTE MATERIAL						
	TYPE		# OF		EPA CODE	
MATERIAL	TREAT	HAZ	DRUMS	LBS		OTHER
ACID WASH WATER	INC	Y	1	498	D002	
CAUSTIC RINSE WATER	INC	Y	12	5,782	D002	
DIPHENYLAMINE	INC	N	3	295		
DRUM RINSE WATER	INC	N	10	4,076		
FEES						
HYDRAULIC FLUID	INC	Y	250	117,090	D005,D006,D018	
HYDRAULIC FLUID CARTRIDGES	INC	N	121	11,719		
LEAD PAINT CHIPS	INC	Y	1	25	D008	
PROTECTIVE GEAR	INC	N	5	167		
TOTAL			403	139,652		

## 96WASTE

1996 PLANTWIDE MATERIAL						
MATERIAL	TYPE TREAT.	HAZ	# OF DRUMS	LBS.	EPA CODE	OTHER
AEROSOL FEES	INC	Y	2	198	D001	
HYDROCHLORIC ACID	INC	Y	3	910	D002	
NICKEL/CADIUM BATTERIES	RR	Y	1	17	D006,D002	
PVC WELL PIPE - AAA & BM AREA	LF	N	2	244		
ROFFING TAR	INC	N	1	458		
USED BATTERIES	INC	N	1	128		
TOTAL			10	1,955		

1996 MALEIC DEPART. WASTE MATERIAL						
	TYPE		# OF			
MATERIAL	TREAT.	HAZ.	DRUMS	LBS.	EPA CODE	OTHER
MALEIC ANHYDRIDE	INC	Y	7	957	U147	
PROTECTIVE GEAR	INC	N	8	494		
TOTAL			15	1,451		

## 96WASTE

1996 L-ASPARTIC WASTE MATERIAL						
	TYPE		# OF			
MATERIAL	TREAT.	HAZ.	DRUMS	LBS.	EPA CODE	OTHER
FEE (CWM)						
GLASS JARS	INC	N	16	5,137		
L-ASPARTIC ACID	INC	N	57	104,895		45 SS
L-ASPARTIC CATALYST	INC	N	8	1,651		
L-ASPARTIC FILTER CARTRIDGE	INC	N	41	5,439		
OIL	INC	Y	1	301	D098, D008, D039	
PROTECTIVE GEAR	INC	N	14	500		
USED OIL AND WATER	INC	Y	5	2,100	D098	
TOTAL			142	120,023		

## 96WASTE

1996 MAINTENANCE DEPT. WASTE MATERIAL						
	TYPE		# OF			
MATERIAL	TREAT	HAZ	DRUMS	LBS.	EPA CODE	OTHER
FLUORESCENT LIGHT BULBS	RR	Y	8	312	D009	
LEAD ACID BATTERIES	RR	Y	4	2,250	D002,D008	
MOZEL (Solvent)	INC	Y	2	906	D001	
OIL	INC	Y	2	566	D008,D039,D098	
OIL FILTER FILTERS	INC	N	1	145		
PROTECTIVE GEAR	INC	N	3	97		
TOTAL			20	4,276		

Pilot Plant

1996 W W BLDG. WASTE MATERIAL						
MATERIAL	TYPE	HAZ	# OF DRUMS	LBS.	EPA CODE	OTHER
ACETIC ACID	INC	Y	6	1591	D002	
ACETONE SOLUTION	INC	Y	30	10,874	D001,F003	
ACETONE/ALCOHOL RINSE	INC	Y	1	450	F003,F005	
ACRYLIC ACID	INC	Y	1	100	D001,D002,U008	
ACTIVATED CARBON/ACETONE	INC	Y	1	50	F003	
ALPHA METHYL STRENE LINEAR DIMER	INC	N	1	49		
AZORYL MOTHER LIQUOR	INC	Y	10	4,533	D001,D002	
AZORYL WASH WATER	INC	Y	5	2,143	D002	
CANS OF PAINT	INC	Y	1	64	D008,D001	
CONTAMINATED LAB MATERIAL	INC	N	1	45		
DIPHENYL OXIDE	INC	N	1	53		
DRUM RINSE WATER	INC	N	2	997		
EMPTY 5 GAL. CANS (LAST HELD OS-124)	INC	N	88	528		
EMPTY BENZENE PHOSPHORUS DRUM	INC	N	1	56		
EMPTY GAS CYLINDER	INC	N	1			
FEES						
HB-40	INC	N	1	48		
HCL LECTURE CYLINDERS	INC	Y	1	23	D002	
HCL/LITHIUM DIISOPROPYLAMIDE	INC	Y	2	1,009	D002	
HYDRAZINE	INC	Y	4	1,668	D002	
ISOPROPANOL DISTILLATE	INC	Y	1	172	D001,D003	
LAB PACK - ALUMINUM CHLORIDE	INC	Y	1	46	D002,D003	
LAB PACK - BENZENE & WATER	INC	Y	1	20	D001,D018	
LAB PACK - TRIETHYLAMINE	INC	Y	1	21	D002	
LAG GLASS	INC	N	2	635		
LEAD PAINT CHIPS	LF	Y	1	125	D008	
LITHIUM DIISOPROPYLAMIDE	INC	Y	91	1,580	D001,D003,F003,F005	
METHANOL	INC	Y	6	1,983	D001,F003	
METHANOL DISTILLATE	INC	Y	2	607	D001,F003	
METHANOL WATER WASH	INC	Y	2	599	D001,F003	
MON 48500 BRINE WASH	INC	N	4	995		
MON 48500 MOTHER LIQUOR	INC	Y	6	2357	D001	
MON 61200 TOLUENE WATER LAYER	INC	Y	3	2,301	F005	
MON 61200 WASH WATER	INC	Y	15	3,636	D002	
MON 61400 MOTHER LIQUOR	INC	Y	9	2,615	D001,F003	
MON 61400 WASH WATER	INC	N	2	652		
MON 61400 WATER DISTILLATE	INC	N	1	338		
MON 70600 FILTRATE WASH	INC	Y	26	10,051	D002	
MON 61400 SODIUM HYDROXIDE WASH	INC	Y	4	1,797	D002	
OS-124 ALUMINA CAKE	INC	N	1	95		
OS-124 FILTER CAKE	INC	N	2	204		
OS-124 FORECUT	INC	N	4	1,547		
OS-124 RESIDUE	INC	N	2	639		
OS-124 TRANSITION CUT	INC	N	5	1644		
OS-138 FILTER CAKE	INC	N	1	145		
PCE WITH SANTOVAC 5	INC	Y	1	210	D039	
POLYSUCCINIMIDE	INC	N	4	648		
PROTECTIVE GEAR	INC	N	36	1,378		
pTSA	INC	Y		33,640	D002	1 TT
SANTOWAX	INC	N	1	14		
SANTOWAX MOTHER LIQUOR	INC	Y	36	13,104	D001,F005	
SCRUBBER SOLUTION	INC	Y	19	8,087		
SODIUM BROMIDE/SODIUM SULFITE	INC	N	2	438		
SODIUM HYDROXIDE AND WATER	INC	Y	9	3,900	D002	
SODIUM METHOXIDE 25 WT. SOLUTION	INC	Y	1	285	D001,D003	
SULFURIC ACID	INC	Y	2	1,196	D002	
THIONYL CHLORIDE	INC	Y	1	100	D001,D002,D003	
THIONYL CHLORIDE/TOLUENE DISTILLATE	INC	Y	8	1838	D001,D003,D002,F005	
TOLUENE	INC	Y	9	2835	D001,F005	
TOLUENE DISTILLATE	INC	Y	15	5,369	D001	
TOLUENE WATER	INC	Y	1	295	D001,F005	
XPM 100J WASH WATER	INC	Y	7	2,429	D002	
TOTAL			501	134,851		

## 96WASTE

1996 UTILITIES WASTE MATERIAL						
	TYPE		# OF			
MATERIAL	TREAT	HAZ	DRUMS	LBS.	EPA CODE	OTHER
OIL	INC	Y	1	165	D008,D039,D098	
COOLING TOWER SLUDGE	INC	Y	1	2,000	D004,D008D006,D011,D007,D005	
TOTAL			2	2,165		

# Monsanto

---

1700 South Second Street  
P.O. Box 7040  
St. Louis, Missouri 63177-7040  
Phone: (314) 622-1400

April 15, 1997

Ms. Dianne Holtmeyer  
Missouri Department of Natural Resources  
Waste Management Program  
P.O. Box 176  
Jefferson City, Mo. 65102

Dear Ms. Holtmeyer;

Enclosed is Monsanto's, J.F. Queeny Plant, St. Louis, Missouri,  
1 st Quarter Generator's Hazardous Waste Report for the period  
ending March 31, 1997.

If you have any questions or need additional information, please  
call me at (314) 622-1469.

Sincerely,

*Richard L. Koenig*  
Richard L. Koenig  
Sr. Environmental Technician



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
HAZARDOUS WASTE PROGRAM  
P.O. BOX 176  
JEFFERSON CITY, MISSOURI 65102  
(314) 751-3176

## GENERATOR'S HAZARDOUS WASTE SUMMARY REPORT - PART I

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL  
OR ENTER:

MONSANTO CO.  
CONTACT: RICHARD L. KOENIG  
1700 S. SECOND ST.  
ST LOUIS CITY MO 63177

\*  
EPA ID=MOD004954111 MO-ID=001002

NOTE: THE FEDERAL EPA AND MISSOURI GENERATOR I.D. NUMBERS ARE ASSIGNED  
EXCLUSIVELY TO THE SITE WHERE WASTE IS PRODUCED. YOU MUST NOTIFY THE  
DEPARTMENT IF THE ADDRESS FOR THE SITE OF GENERATION CHANGES

### NOTE ► PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

#### SECTION A - REPORT IDENTIFICATION

1. TYPE OF REPORT (CHECK ONE)

☒ QUARTERLY ☐ ANNUAL

(IF ANNUAL CHECKED, PLACE X IN 6-30 BOX)

2. FOR THE PERIOD ENDING (CHECK ONE & FILL IN YEAR)

☐ 9-30-\_\_\_\_ (YEAR) ☐ 12-31-\_\_\_\_ (YEAR)

☒ 3-31-97 (YEAR) ☐ 6-30-\_\_\_\_ (YEAR)

3. PAGE

1 OF 6

#### SECTION B - GENERATOR IDENTIFICATION

NOTE: Any change in either the mailing or site address from previous reports requires renotification to the Department.

4. GENERATOR'S NAME ☒ SAME AS LABEL

5. GENERATOR CONTACT PERSON (NAME) ☒ SAME AS LABEL

TELEPHONE NUMBER

(314) 622-1469

6. MAILING ADDRESS

CITY

STATE

ZIP CODE

7. PLANT SITE ADDRESS ☒ SAME AS LABEL

CITY

STATE

ZIP CODE

8. NAME OF PARENT FIRM MONSANTO CO.

800 NORTH LINDBERGH BLVD., ST. LOUIS, MO. 63167

OFFICE USE ONLY

#### SECTION C - STATUS OF WASTE GENERATED (CHECK ONE)

9. ☒ SHIPPED OFF-SITE. Complete part 2, attach  
completed hazardous waste manifests, sign  
certification and transmit to the department.

10.

☐ REPORTABLE QUANTITY NOT GENERATED. Sign  
certification and transmit to the department. (Do not  
complete Part 2)

11.

☐ REPORTABLE QUANTITY GENERATED BUT NOT SHIPPED  
OFF-SITE THIS QUARTER. Sign certification and transmit to  
the department. (Do not complete Part 2).

#### SECTION D - COMMENTS

12

#### SECTION E - CERTIFICATION STATEMENT

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

PRINT NAME

ROBERT L. CHEEVER

SIGNATURE

Robert L. Cheever

DATE

4-15-97



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
HAZARDOUS WASTE PROGRAM

P.O. BOX 176  
JEFFERSON CITY, MISSOURI 65102  
(314) 751-3176

GENERATOR'S HAZARDOUS WASTE  
SUMMARY REPORT - PART II

BEFORE COPYING FORM, ENTER THE GENERATOR'S NAME  
AND IDENTIFICATION NUMBERS AS SHOWN ON PART I.

GENERATOR NAME

MONSANTO COMPANY, J. F. QUEENY PLANT

EPA ID NUMBER

M. O. D. 0. 0. 4. 9. 5. 4. 1. 1. 1

MISSOURI I.D. NUMBER

0. 0. 1. 0. 0. 2

NOTE ► PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

ATTENTION: Summarize all shipments made to the Hazardous Waste Management Facility you have identified in Section G below. Additional pages are required for each off-site management facility utilized.

SECTION F - REPORT IDENTIFICATION (AS SHOWN ON PART I)

1. FOR THE PERIOD ENDING (CHECK ONE & FILL IN YEAR)

☐ 9-30- (YEAR)

☐ 12-31- (YEAR)

☒ 3-31-97 (YEAR)

☐ 6-30- (YEAR)

2. PAGE

2 of 6

SECTION G - FACILITY IDENTIFICATION

3. FACILITY NAME (NAME OF OFF-SITE LOCATION WHERE WASTE WAS DELIVERED)

Recyclights, Inc.

5. FACILITY SITE ADDRESS

405 West 86<sup>th</sup> Street

CITY

Bloomington

STATE

MN

ZIP CODE

55420

4. FACILITY'S EPA I.D. NUMBER

MN0000903468

6. FACILITY'S MISSOURI I.D. NUMBER

SECTION H - WASTE IDENTIFICATION

1	7 DESCRIPTION OF WASTE SHIPPED TO THE FACILITY LISTED ABOVE	8 EPA HAZARDOUS WASTE NUMBER	9 TAX CODE (SEE INST.)	10. TOTAL AMOUNT OF WASTE	11. UNIT OF MEAS.	12 SPECIFIC GRAVITY	13. FINAL HANDLING CODE
1	Fluorescent Light Bulbs	D0006 D0009		102	P	:	T04
2							
3							
4							
5							
6							
7							
8							

SECTION I - TRANSPORTATION SERVICES UTILIZED

14. COMPANY NAME	15. MISSOURI ID NO.	16. US EPA I.D. NUMBER
a. Safeway Chemical	H-2126	DER0000000273
b.		
c.		

SECTION J - COMMENTS

Section H, Line 1, #13: Recyclights Recovers the Mercury



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
HAZARDOUS WASTE PROGRAM

P.O. BOX 176

JEFFERSON CITY, MISSOURI 65102

(314) 751-3176

GENERATOR'S HAZARDOUS WASTE  
SUMMARY REPORT - PART II

BEFORE COPYING FORM, ENTER THE GENERATOR'S NAME  
AND IDENTIFICATION NUMBERS AS SHOWN ON PART I.

GENERATOR NAME

MONSANTO COMPANY, J. F. QUEENY PLANT

EPA ID NUMBER

M. O. D. O. O. 4. 9. 5. 4. 1. 1. 1

MISSOURI ID. NUMBER

0. 0. 1. 0. 0. 2

NOTE ► PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

ATTENTION: Summarize all shipments made to the Hazardous Waste Management Facility you have identified in Section G below. Additional pages are required for each off-site management facility utilized.

SECTION F - REPORT IDENTIFICATION (AS SHOWN ON PART I)

1. FOR THE PERIOD ENDING (CHECK ONE & FILL IN YEAR)

☐ 9-30- (YEAR)

☐ 12-31- (YEAR)

☒ 3-31-97 (YEAR)

☐ 6-30- (YEAR)

2. PAGE

3 OF 6

SECTION G - FACILITY IDENTIFICATION

3. FACILITY NAME (NAME OF OFF-SITE LOCATION WHERE WASTE WAS DELIVERED)

Dupont Co.

4. FACILITY'S EPA I.D. NUMBER

NJD 002385730

5. FACILITY SITE ADDRESS

Chambers Work

6. FACILITY'S MISSOURI I.D. NUMBER

CITY

Deepwater

STATE

NJ

ZIP CODE

08023

SECTION H - WASTE IDENTIFICATION

LINE	DESCRIPTION OF WASTE SHIPPED TO THE FACILITY LISTED ABOVE	EPA HAZARDOUS WASTE NUMBER	TAX CODE (SEE INST.)	TOTAL AMOUNT OF WASTE	UNIT OF MEAS.	SPECIFIC GRAVITY	FINAL HANDLING CODE
1	Corrosive Liquid (Sulfuric Acid), Reaction Mass Filtrate. p-TSA	D002		33,300	P	:	TO 4
2						.	.
3						.	.
4						.	.
5						.	.
6						.	.
7						.	.
8						.	.

SECTION I - TRANSPORTATION SERVICES UTILIZED

14. COMPANY NAME	15. MISSOURI ID NO.	16. US EPA I.D. NUMBER
a. SJ Transportation Co.	H-1469	NJD 071629976
b.	H- . . . . .	. . . . .
c.	H- . . . . .	. . . . .

SECTION J - COMMENTS

17 Section H, Line 1, #13: After treatment, discharge to surface water under NPDES.



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
HAZARDOUS WASTE PROGRAM

P.O. BOX 176  
JEFFERSON CITY, MISSOURI 65102  
(314) 751-3176

GENERATOR'S HAZARDOUS WASTE  
SUMMARY REPORT - PART II

BEFORE COPYING FORM, ENTER THE GENERATOR'S NAME  
AND IDENTIFICATION NUMBERS AS SHOWN ON PART I.

GENERATOR NAME

MONSANTO COMPANY, J. F. QUEENY PLANT

EPA ID NUMBER

M. O. D. O. O. 4. 9. 5. 4. 1. 1. 1

MISSOURI I.D. NUMBER

0 0 1 0 0 2

NOTE ► PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

ATTENTION: Summarize all shipments made to the Hazardous Waste Management Facility you have identified in Section G below. Additional pages are required for each off-site management facility utilized.

SECTION F - REPORT IDENTIFICATION (AS SHOWN ON PART I)

1. FOR THE PERIOD ENDING (CHECK ONE & FILL IN YEAR)

☐ 9-30- (YEAR) ☐ 12-31- (YEAR)  
☒ 3-31-97 (YEAR) ☐ 6-30- (YEAR)

2. PAGE

4 of 6

SECTION G - FACILITY IDENTIFICATION

3. FACILITY NAME (NAME OF OFF-SITE LOCATION WHERE WASTE WAS DELIVERED)

Allworth of Tennessee

5. FACILITY SITE ADDRESS

101 South Park Ave

CITY

Mount Pleasant

STATE

TN

ZIP CODE

38474

4. FACILITY'S EPA I.D. NUMBER

TN D 981920119

6. FACILITY'S MISSOURI I.D. NUMBER

RR TN 07

SECTION H - WASTE IDENTIFICATION

1	7 DESCRIPTION OF WASTE SHIPPED TO THE FACILITY LISTED ABOVE	8 EPA HAZARDOUS WASTE NUMBER	9 TAX CODE (SEE INST.)	10 TOTAL AMOUNT OF WASTE	11 UNIT OF MEAS.	12 SPECIFIC GRAVITY	13 FINAL HANDLING CODE
1	Ignitable Unused Raw Material Triethylamine	D 0 0 1		190	P	:	T 0 3
2	Ignitable solvent used to clean equipment: Acetone Solution	F 0 0 3		5,403	P	:	T 0 3
3	Ignitable liquid used to washout equipment: Cyclohexane Washout	D 0 0 1		1,423	P	:	T 0 3
4	Ignitable liquid used to clean equipment: APO Acetone	F 0 0 3		1,434	P	:	T 0 3
5	Ignitable distillate from column Ethyl Acetate Distillate	D 0 0 1		1,099	P	:	T 0 3
6	Ignitable and corrosive liquid: hydrochloric acid, cyclohexane; TBAA Mother Liquor	D 0 0 1 D 0 0 2		568	P	:	T 0 3
7	Ignitable and corrosive by product: Hydrochloric Acid, Triethylamine; TEA/HCL Solution	D 0 0 1 D 0 0 2		480	P	:	T 0 3
8	Ignitable distillate from reactor: Triethylamine Distillate	D 0 0 1		70	P	:	T 0 3

SECTION I - TRANSPORTATION SERVICES UTILIZED

14. COMPANY NAME	15. MISSOURI ID NO	16. US EPA I.D. NUMBER
a. Allworth of Tennessee	H-1786	TN D 981920119
b.	H- . . . . .	. . . . .
c.	H- . . . . .	. . . . .

SECTION J - COMMENTS

17



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
HAZARDOUS WASTE PROGRAM

P.O. BOX 176

JEFFERSON CITY, MISSOURI 65102

(314) 751-3176

GENERATOR'S HAZARDOUS WASTE  
SUMMARY REPORT - PART II

BEFORE COPYING FORM, ENTER THE GENERATOR'S NAME  
AND IDENTIFICATION NUMBERS AS SHOWN ON PART I.

GENERATOR NAME

MONSANTO COMPANY, J. F. QUEENY PLANT

EPA ID NUMBER

M.O.D.O.O.4.9.5.4.1.1.1

MISSOURI I.D. NUMBER

0.0.1.0.0.2

NOTE ► PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

ATTENTION: Summarize all shipments made to the Hazardous Waste Management Facility you have identified in Section G below. Additional pages are required for each off-site management facility utilized.

SECTION F - REPORT IDENTIFICATION (AS SHOWN ON PART I)

1. FOR THE PERIOD ENDING (CHECK ONE & FILL IN YEAR)

☐ 9-30- (YEAR)

☐ 12-31- (YEAR)

☒ 3-31-97 (YEAR)

☐ 6-30- (YEAR)

2. PAGE

5 OF 6

SECTION G - FACILITY IDENTIFICATION

3. FACILITY NAME (NAME OF OFF-SITE LOCATION WHERE WASTE WAS DELIVERED)

Allworth of Tennessee

4. FACILITY'S EPA I.D. NUMBER

TND981920119

5. FACILITY SITE ADDRESS

101 South Park Ave.

6. FACILITY'S MISSOURI I.D. NUMBER

RR-TN07

CITY

Mount Pleasant

STATE

TN

ZIP CODE

38474

SECTION H - WASTE IDENTIFICATION

7	8	9	10	11	12	13
DESCRIPTION OF WASTE SHIPPED TO THE FACILITY LISTED ABOVE	EPA HAZARDOUS WASTE NUMBER	TAX CODE (SEE INST.)	TOTAL AMOUNT OF WASTE	UNIT OF MEAS.	SPECIFIC GRAVITY	FINAL HANDLING CODE
1 Ignitable solvent used to clean equipment: Toluene	F005		679	P	:	T03
2 Ignitable solvent used to clean equipment: PSI Acetone	F003		393	P	:	T03
3 Ignitable lab solvents containing Methanol and Acetone	D002 F003		1,816	P	:	T03
4 Corrosive material used to clean out reactor: Potassium Hydroxide Wash	D002 D001		4,994	P	:	T03
5 Maleic Anhydride	U147		1,815	P	:	T03
6 Hydraulic Fluid containing Barium, Cadmium, Benzene	D005 D006		37,361	P	:	T03
7 Used Oil	D008		1,683	P	:	T03
8 Unused Raw Material: Hydrogen Peroxide	D001		86	P	:	T03

SECTION I - TRANSPORTATION SERVICES UTILIZED

14. COMPANY NAME	15. MISSOURI ID NO	16. US EPA I.D. NUMBER
a Allworth of Tennessee	H-1786	TND981920119
b	H- . . . .	. . . . .
c	H- . . . .	. . . . .

SECTION J - COMMENTS

17



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
HAZARDOUS WASTE PROGRAM

P.O. BOX 176  
JEFFERSON CITY, MISSOURI 65102  
(314) 751-3176

GENERATOR'S HAZARDOUS WASTE  
SUMMARY REPORT - PART II

BEFORE COPYING FORM, ENTER THE GENERATOR'S NAME  
AND IDENTIFICATION NUMBERS AS SHOWN ON PART I.

GENERATOR NAME

MONSANTO COMPANY, J. F. QUEENY PLANT

EPA ID NUMBER

M. O. D. O. O. 4. 9. 5. 4. 1. 1. 1

MISSOURI I.D. NUMBER

0. 0. 1. 0. 0. 2

NOTE ► PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

ATTENTION: Summarize all shipments made to the Hazardous Waste Management Facility you have identified in Section G below. Additional pages are required for each off-site management facility utilized.

SECTION F - REPORT IDENTIFICATION (AS SHOWN ON PART I)

1. FOR THE PERIOD ENDING (CHECK ONE & FILL IN YEAR)

☐ 9-30- (YEAR) ☐ 12-31- (YEAR)  
☒ 3-31-97 (YEAR) ☐ 6-30- (YEAR)

2. PAGE

6 of 6

SECTION G - FACILITY IDENTIFICATION

3 FACILITY NAME (NAME OF OFF-SITE LOCATION WHERE WASTE WAS DELIVERED)

Allworth of Tennessee

5 FACILITY SITE ADDRESS

101 South Park Ave

CITY

Mount Pleasant

STATE

TN

ZIP CODE

38474

4. FACILITY'S EPA I.D. NUMBER

TND981920119

6. FACILITY'S MISSOURI I.D. NUMBER

RR-TN-07

SECTION H - WASTE IDENTIFICATION

1	7 DESCRIPTION OF WASTE SHIPPED TO THE FACILITY LISTED ABOVE	8 EPA HAZARDOUS WASTE NUMBER	9 TAX CODE (SEE INST.)	10 TOTAL AMOUNT OF WASTE	11 UNIT OF MEAS.	12 SPECIFIC GRAVITY	13 FINAL HANDLING CODE
1	Ignitable process samples containing methanol: Puralink Methanol and water	F-0-0-3		265	P	:	TO 3
2	Ignitable out dated cans of paint	D-0-0-1 D-0-0-8		70	P	:	TO 3
3	Corrosive filter material containing Potassium Hydroxide RC-45 Mother liquor	D-0-0-2		242	P	:	TO 3
4	Corrosive liquid used in rinsing of drums - Sodium Hydroxide Caustic Rinse water	D-0-0-2		2502	P	:	TO 3
5							
6							
7							
8							

SECTION I - TRANSPORTATION SERVICES UTILIZED

14 COMPANY NAME	15 MISSOURI ID NO	16 US EPA I.D. NUMBER
Allworth of Tennessee	H-1-7-86	TND981920119
	H- . . . . .	. . . . .
	H- . . . . .	. . . . .

SECTION J - COMMENTS

17



MINNESOTA POLLUTION CONTROL AGENCY  
HAZARDOUS WASTE DIVISION  
520 LAFAYETTE ROAD  
ST. PAUL, MINNESOTA 55155  
ATTN: HWIMS

RECEIVED  
RK 3-1497

OMB No. 2050-0039  
EXPIRES 9/30/96

Please TYPE (Form designed for use on elite (12-pitch) typewriter) or print LEGIBLY. Instructions on cover page.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M O D 0 0 4 9 5 4 1 1 1 9 7 0 0 8	Manifest Document No. 197008	2. Page 1 of 1	Information in shaded area not required by Federal law. Minnesota rules require items H. and I.	
3. Generator's Name and Mailing Address (Also location of waste generation if different from mailing address.) Monsanto 1700 South 2nd St. Paul, MN 55108 (612) 777 (314) 622 1469 County: St. Louis, Mo.				A. State Manifest Document Number MN 188291		
5. Transporter 1 Company Name Mallack, Inc. Safeway Chemical				B. State Generator's ID MO-01002		
6. US EPA ID Number P E R 0 8 9 0 0 0 7 3				C. State Transporter's ID # 1441 H2126		
7. Transporter 2 Company Name				D. Transporter's Phone 1-800-434-9430		
8. US EPA ID Number				E. State Transporter's ID 433-8400		
9. Designated Facility Name and Site Address RECYCLIGHTS 405 West 86th St. Bloomington MN 55420				F. Transporter's Phone		
10. U.S EPA ID Number M N 0 0 0 0 9 0 3 4 6 8				G. State Facility's ID		
H. Facility's Phone 612-948-0626						
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	
a. X Hazardous Waste Solid, n.o.s., (cadmium, lead mercury), 9, KA3077, PG III		002 D F	RK 102	00+50 P	D006 D008 D009	
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above A) Fluorescent Lights for Recycle - D009-1009, 11,400 mg of mercury 152-4F Tubes 2-u-Bat				K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information If undeliverable return to generator. In case of emergency call Chemtrec at 1-800-434-9300. DOT Emergency Guide #'s 11A) 31 Trailer License # Maine - W37982 Mo. Shipment # 0006						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations. If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name Richard L Kenig				Signature Richard Kenig		
17. Transporter 1 Acknowledgement of Receipt of Materials				Date 03/04/97		
Printed/Typed Name Charles F. Jones				Signature Charles F. Jones		
18. Transporter 2 Acknowledgement of Receipt of Materials				Date 03/04/97		
Printed/Typed Name				Signature		
19. Discrepancy Indication Space Item 15 & 1997 ERG # is 171.						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name Blanche Collins				Signature Blanche Collins		
				Date 8-30-97		



State of New Jersey  
Department of Environmental Protection  
Hazardous Waste Regulation Program  
Manifest Section

CN 421, Trenton, NJ 08625-0421

RECEIVED  
3/7/97 R/C

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039 Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1	Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address		Mo 01004954111197007		A. State Manifest Document Number <b>NJA 2213846</b>		
Monisanto Co. 1700 South Second Street, St Louis, MO 63177				B. State Generator's ID (Gen. Site Address) Same		
4. Generator's Phone (314) 622-1400 c/o Rich K...		6. US EPA ID Number		C. State Trans. ID-NJDEPE 03217		
5. Transporter 1 Company Name SJ Transportation Co.		7. US EPA ID Number NJ0107112799716		D. Transporter's Phone (609) 769-2744		
9. Designated Facility Name and Site Address Dupont Co. Chambers Work Deerwater, NJ 08023		10. US EPA ID Number NJ010602385730		E. State Trans. ID-NJDEPE Decal No.		
11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group) HM		12. Containers		13. Total Quantity	14. Unit Wt/Vol	
a. Waste, Corrosive Liquid, W.D.S (Sulfuric Acid), 9,		No.	Type			
b. X UN1700, P III		0101	TT33300P		0101012	
c.						
d.						
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above				
Water-84-95% Sulfuric Acid 13%		T01				
p-Toluenesulfonic Acid 0.5%						
Phenylbenzene Sulfonic Acid 0.5%						
p-Toluenesulfonic Acid 0.5%						
15. Special Handling Instructions and Additional Information		Trailer License # NJ-T 858-MW MO Shipments # 0007 MO Generator ID # 01002 24 Hr. Emergency Contact: Monisanto Co. (314) 622-1516 TEH 10101115 Return to Generator				
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name Richard L. K...		Signature P. G. ...		Month Day Year 10/31/1997		
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Gary B...		Signature Gary B...		
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		
19. Discrepancy Indication Space		ITEM 4 - SHOULD READ 609-540-2773 ITEM 15 - SHOULD HAVE ERG-154				
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.		Printed/Typed Name THOMAS DATA S.		Signature THOMAS DATA S.		

INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET.

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality  
Hazardous Waste Program

P.O. Box 176 Jefferson City, Missouri 65102  
314-751-3176

3-3-97 R

EMERGENCY RESPONSE  
U.S. COAST GUARD  
1-800-424-8802  
CHEM TREC  
1-800-424-9300  
DEPT. OF NATURAL RESOURCES  
314-634-2436

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039, Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. Missouri 495411197001		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is required by State law.							
3. Generator's Name and Mailing Address MONSON TO CO. 1700 South Second Street, St. Louis, MO 63177						A. Missouri Manifest Document Number 0011002 0001									
4. Generator's Phone (314) 622-1400 for Rich Koenig						B. G.S.I. (Gen. Site Address) Same									
5. Transporter 1 Company Name Allworth of Tennessee						C. MO. Trans. ID H1786/TNV-47767									
6. US EPA ID Number TMD981920119						D. Transporter's Phone (615) 379-2800									
7. Transporter 2 Company Name						E. MO. Trans. ID									
8. US EPA ID Number						F. Transporter's Phone									
9. Designated Facility Name and Site Address Allworth of Tennessee 101 South Park Ave Mount Pleasant, TN 38474						G. State Facility's ID									
10. US EPA ID Number TMD981920119						H. Facility's Phone (615) 379-2800									
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol.		I. Waste No.			
a. Waste, Triethylamine, 3, UN1296, PG II						001 DM		190		300 P		EPA WASTE CODE D1001			
b. Waste, Acetone, 3, UN1090, PG II						014 DM		4409 P		PK		EPA WASTE CODE F1013			
c. Waste, Flammable Liquid, n.o.s. (Cyclohexane), 3, UN1993, PG II						004 DM		1423 P				EPA WASTE CODE D1011			
d. Waste, Flammable Liquid, n.o.s. (Acetone), 3, UN1993, PG II						004 DM		1434 P				EPA WASTE CODE F1013			
J. Additional Descriptions for Materials Listed Above						K. HANDLING CODE (FACILITY USE ONLY)									
a. Triethylamine - TN324294 - D001 - 100%						a. INTERIM FINAL COMMENTS									
b. Acetone Solution - TN002977 - F003 - 100%						b. INTERIM FINAL COMMENTS									
c. Cyclohexane Washout - TN324285 - D001 - 100%						c. INTERIM FINAL COMMENTS									
d. A DPO Acetone - TN324287 - F003 - 100%						d. INTERIM FINAL COMMENTS									
15. Special Handling Instructions and Additional Information IF Undeliverable, Return to Generator 24 Hr. Emergency Contact: Monson to Co. (314) 622-1516															
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.															
Printed/Typed Name Richard L. Koenig						Signature Richard L. Koenig						Month Day Year 02 12 1997			
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name Carl Chapman						Signature Carl Chapman		Month Day Year 02 12 1997	
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name						Signature		Month Day Year	
19. Discrepancy Indication Space															
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.															
Printed/Typed Name Billy Brooks						Signature Billy Brooks						Month Day Year 10 21 1997			

MISSOURI DNR FINAL COPY - PART 1

THIS COPY MUST BE SENT BACK TO THE GENERATOR BY THE DESIGNATED FACILITY THEN TRANSMITTED TO THE DEPARTMENT BY THE GENERATOR.

INSTRUCTIONS FOR THE COM-  
PLETION OF THIS FORM ARE ON A  
SEPARATE SHEET.

THIS DOCUMENT MUST BE USED  
FOR ALL MISSOURI-DESTINED  
SHIPMENTS.

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
Division of Environmental Quality  
Hazardous Waste Program  
P.O. Box 176 Jefferson City, Missouri 65102  
314-751-3176

3-397 RK

EMERGENCY RESPONSE  
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1-800-424-9300  
DEPT. OF NATURAL RESOURCES  
314-634-2436

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039, Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M.C.D.C. 049.541.1.197062		Manifest Document No. 049.541.1.197062		2. Page 1 of 1		Information in the shaded areas is required by State law.									
3. Generator's Name and Mailing Address Monsanto Co 1700 South Second Street, St. Louis, MO. 63177						A. Missouri Manifest Document Number 0010020002											
4. Generator's Phone (314) 622-1400 x0 Rich Koenig						B. G.S.I. (Gen. Site Address) Same											
5. Transporter 1 Company Name Allworth of Tennessee						C. MO. Trans. ID H1786/TNV-47767											
7. Transporter 2 Company Name						D. Transporter's Phone (615) 379-2800											
6. US EPA ID Number TN.D.9.8.1.920.1.19						E. MO. Trans. ID											
8. US EPA ID Number						F. Transporter's Phone											
9. Designated Facility Name and Site Address Allworth of Tennessee 101 South Park Ave Mount Pleasant, TN 38474						G. State Facility's ID											
10. US EPA ID Number TN.D.9.8.1.920.1.19						H. Facility's Phone (615) 379-2800											
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers Number Type		13. Total Quantity		14. Unit Wt/Vol.		I. Waste No.					
a. Waste, Flammable Liquid, N.O.S. (Ethyl Acetate), 3, UN1993, PG-II						003 DM		8.63		P		EPA WASTE CODE D1001 STATE None					
b. Waste, Flammable Liquid, Corrosive, N.O.S. (Cyclohexane, Hydrochloric Acid), 3, UN1294, PG-II						001 DM		5.00		P		EPA WASTE CODE D1011 STATE None					
c. Waste, Flammable Liquid, Corrosive, N.O.S. (Triethylamine, Hydrochloric Acid), 3, UN1294, PG-II						002 DM		4.50		P		EPA WASTE CODE D1011 STATE None					
d. Waste, Flammable Liquid, N.O.S. (Triethylamine), 3, UN1993, PG-II						001 DM		20		P		EPA WASTE CODE D1011 STATE None					
J. Additional Descriptions for Materials Listed Above						K. HANDLING CODE (FACILITY USE ONLY)											
a. Ethyl Acetate Distillate - TN 324288 - D001 - 100%						a. INTERIM FINAL COMMENTS											
b. TBAA Mother Liquor - TN 324290 - D001, D002 - 100%						b. INTERIM FINAL COMMENTS											
c. TEA/HCL Solution - TN 324291 - D001, D002 - 100%						c. INTERIM FINAL COMMENTS											
d. Triethylamine Distillate - TN 324282 - D001 - 100%						d. INTERIM FINAL COMMENTS											
15. Special Handling Instructions and Additional Information IF Unrecoverable, Return To Generator 24 Hr. Emergency Contact: Monsanto Co. (314) 622-1516																	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.																	
Printed/Typed Name Richard L Koenig						Signature Richard L Koenig						Month Day Year 02/20/97					
17. Transporter 1 Acknowledgement of Receipt of Materials												Date					
Printed/Typed Name Carl Chapman						Signature Carl Chapman						Month Day Year 02/20/97					
18. Transporter 2 Acknowledgement of Receipt of Materials												Date					
Printed/Typed Name						Signature						Month Day Year					
19. Discrepancy Indication Space																	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.												Date					
Printed/Typed Name Billy Brooks						Signature Billy Brooks						Month Day Year 02/21/97					

MISSOURI DNR FINAL COPY - PART 1

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INSTRUCTIONS FOR THE COM-  
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MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality  
Hazardous Waste Program

P.O. Box 176 Jefferson City, Missouri 65102  
314-751-3176

3397 RK

EMERGENCY RESPONSE  
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1-800-424-9300  
DEPT. OF NATURAL RESOURCES  
314-634-2436

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039. Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page of	Information in the shaded areas is required by State law.	
3. Generator's Name and Mailing Address Monsanto Co. 1700 South Second Street, St. Louis, MO 63177		MO.D.0.044541.1.197403		A. Missouri Manifest Document Number 0.0.1.0.02 0.0.03		
4. Generator's Phone (314) 622-1700 c/o Rich Koenig		6. US EPA ID Number T.M.D.9.8.1.9.2.0.1.1.9		B. G.S.I. (Gen. Site Address) Same		
5. Transporter 1 Company Name Allworth of Tennessee		8. US EPA ID Number		C. MO. Trans. ID H786/TN-V-47967		
7. Transporter 2 Company Name		10. US EPA ID Number		D. Transporter's Phone (615) 379-2800		
9. Designated Facility Name and Site Address RKMS Allworth of Tennessee 101 South Park Ave Mount Pleasant, TN 38474		12. Containers Number Type		E. MO. Trans. ID		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		13. Total Quantity		F. Transporter's Phone		
a. HM X Waste, Toxic, 3, UN1294, PG-II		002 DM 5.25 P		G. State Facility's ID		
b. X Waste, Flammable Liquid, N.O.S. (Acetone), 3, UN1993, PG-II		001 DM 393 P		H. Facility's Phone (615) 379-2800		
c. X Waste, Flammable Liquid, N.O.S. (Acetone, Methanol), 3, UN1993, PG-II		003 DM 1358 P		I. Waste No.		
d. X Waste, Corrosive Liquid, N.O.S. (Potassium Hydroxide), 8, UN1700, PG-II		007 DM 3979 P		EPA WASTE CODE F.0.0.3 STATE none		
J. Additional Descriptions for Materials Listed Above		K. HANDLING CODE (FACILITY USE ONLY)		EPA WASTE CODE F.0.0.3 STATE none		
a. Toluene - TN003235 - F005 - 100%		a. INTERIM FINAL COMMENTS		EPA WASTE CODE D.0.0.2 STATE none		
b. PSI Acetone - TN324283 - F003 - 100%		b.		EPA WASTE CODE F.0.0.3 STATE none		
c. Lab Solvents - TN003091 - F003, F005, P020 - 100%		c.		EPA WASTE CODE F.0.0.3 STATE none		
d. Potassium Hydroxide Wash TN324284 - P020 - 100%		d.		EPA WASTE CODE D.0.0.2 STATE none		
15. Special Handling Instructions and Additional Information IF Undeliverable, Return To Generator 24 Hr. Emergency Contact: Monsanto Co. (314) 622-1516		16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.				
Printed/Typed Name Richard L Koenig		Signature Richard L Koenig		Month Day Year 02/20/97		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Carl Chapman		Signature Carl Chapman		Month Day Year 02/20/97		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Bilb Brook		Signature Bilb Brook		Month Day Year 02/21/97		

MISSOURI DNR FINAL COPY - PART 1

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INSTRUCTIONS FOR THE COM-  
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MISSOURI DEPARTMENT OF NATURAL RESOURCES  
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Hazardous Waste Program  
P.O. Box 176 Jefferson City, Missouri 65102  
314-751-3176

3-397 RC

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1-800-424-9300  
DEPT. OF NATURAL RESOURCES  
314-634-2436

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039. Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M.O.D.C. 4954.1.1.119700H	Manifest Document No. 001002	2. Page 1 of 1	Information in the shaded areas is required by State law.	
3. Generator's Name and Mailing Address MONSIEUR 1700 South Second Street, St. Louis, MO 63177			A. Missouri Manifest Document Number 001002			
4. Generator's Phone (314) 622-1400 c/o Rich Kenig			B. G.S.I. (Gen. Site Address) Same			
5. Transporter 1 Company Name Allworth of Tennessee			C. MO. Trans. ID H1786/TNV-47767			
7. Transporter 2 Company Name			D. Transporter's Phone (615) 379-2800			
6. US EPA ID Number TN A98.1920.119			E. MO. Trans. ID			
8. US EPA ID Number			F. Transporter's Phone			
9. Designated Facility Name and Site Address Allworth of Tennessee 101 South Park Ave Mount Pleasant, TN 38474			G. State Facility's ID			
10. US EPA ID Number TN D98.1920.119			H. Facility's Phone (615) 379-2800			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers Number Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.	
a. HM	Waste, Maleic Anhydride, 8. UN 2215; PG III	007 DF	1.015	P	EPA WASTE CODE D.1.1.7 STATE D.1.1.7	
b. X	Hazardous Waste, Liquid, N.O.S. (D005, P018), 9. NA 3082, PG III	23 RF	1.5665	P	EPA WASTE CODE D.005 STATE D.005	
c.	Non Hazardous Waste	001 DM	74	P	EPA WASTE CODE N.O.N.E. STATE N.O.N.E.	
d.	Non Hazardous Waste	001 DM	216	P	EPA WASTE CODE N.O.N.E. STATE N.O.N.E.	
J. Additional Descriptions for Materials Listed Above		K. HANDLING CODE (FACILITY USE ONLY)				
a. Maleic Anhydride - TN 002975 - 0147 = 100%		INTERIM FINAL COMMENTS				
b. Hydraulic Fluid - TN 003092 - D005, P006, P018 = 100%						
c. Diphenyl Oxide - TN 324286						
d. Gulf Tene 16 - TN 324292						
15. Special Handling Instructions and Additional Information IF Undeliverable, Return To Generator 24 Hr. Emergency Contact: MONSIEUR (314) 622-1516						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.						
Printed/Typed Name Richard L Kenig		Signature Richard L Kenig		Month Day Year 02 12 1997		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Carl Chapman		Date 02 12 1997		
Printed/Typed Name Carl Chapman		Signature		Month Day Year		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date		
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name Billy Brooks		Signature Billy Brooks		Month Day Year 02 12 1997		

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# MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality

Hazardous Waste Program

P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

3/21/97 RK

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## HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039. Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MO.D.00.495.4.1.1.197.005	Manifest Document No. 000005	2. Page 1 of 1	Information in the shaded areas is required by State law.	
3. Generator's Name and Mailing Address Monsanto Co. 1700 South Second Street, St. Louis, MO 63177				A. Missouri Manifest Document Number 0.00.0.0.2.0.0.0.5		
4. Generator's Phone (314) 622-1400				B. G.S.I. (Gen. Site Address) Same		
5. Transporter 1 Company Name Allworth of Tennessee				C. MO. Trans. ID H1786/TNV-47767		
6. US EPA ID Number TMD981920119				D. Transporter's Phone (615) 375-2800		
7. Transporter 2 Company Name				E. MO. Trans. ID		
8. US EPA ID Number				F. Transporter's Phone		
9. Designated Facility Name and Site Address Allworth of Tennessee 101 South Park Ave. Mount Pleasant, TN 38474				G. State Facility's ID		
10. US EPA ID Number TMD981920119				H. Facility's Phone (615) 375-2800		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers	13. Total Quantity	
				Number	Type	
a. Non Hazardous Waste				019	DF 667 P	
b. Non Hazardous Waste				008	DF 640 P	
c. Used Oil, Not Hazardous Under DOT or EPA				001	PM 400 P	
d. Non Hazardous				006	PM 3301 P	
J. Additional Descriptions for Materials Listed Above				K. HANDLING CODE (FACILITY USE ONLY)		
a. Contaminated Protective Gear - TN002950				INTERIM		
b. Hydraulic Fluid Filter Cartridge - TN002926				FINAL		
c. Used Oil - TN003092				COMMENTS		
d. Duralink Wet Cake - TN321440						
15. Special Handling Instructions and Additional Information IF undeliverable, Return To Generator 24 Hr. Emergency Contact: Monsanto (314) 622-1516						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.						
Printed/Typed Name Richard L. Koenig		Signature Richard Koenig		Month Day Year 02/20/97		
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Paul Chapman		Signature Paul Chapman		
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		
19. Discrepancy Indication Space						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name Billy Brakes		Signature Billy Brakes		Month Day Year 02/21/97		

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Form Approved OMB No 2050-0039, Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M.O.D.O.O.4954111197009	Manifest Document No. of 1	2. Page of 1	Information in the shaded areas is required by State law.	
3. Generator's Name and Mailing Address Monsanto Co. 1700 South Second Street, St. Louis, 63177		4. Generator's Phone (314) 622-1400		5. Transporter 1 Company Name Allworth of Tennessee		
6. US EPA ID Number T.N.D.9.8.1.9.2.0.1.1.9		7. Transporter 2 Company Name		8. US EPA ID Number		
9. Designated Facility Name and Site Address Allworth of Tennessee 101 South Park Ave Mount Pleasant, TN 38474		10. US EPA ID Number T.N.D.9.8.1.9.2.0.1.1.9		Missouri Manifest Document Number 30150002 00009		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers Number Type		13. Total Quantity		
a. Waste, Acetone, 3, UN1090, PGII		005 DM		9.94 P		
b. Waste, Flammable Liquid, N.O.S. (Ethyl Acetate), 3, UN1993, PGII		002 DM		23.6 P		
c. Waste, Flammable Liquid, Corrosive, N.O.S. (Cyclohexane, Hydrochloric Acid), 3, UN1294, PGII		001 DM		2.68 P		
d. Waste, Toluene, 3, UN1294, PGII		001 DM		1.54 P		
J. Additional Descriptions for Materials Listed Above		K. HANDLING CODE (FACILITY USE ONLY)		L. COMMENTS		
a. Acetone Solution - TN002977 - F003-100%		b.		c.		
b. Ethyl Acetate Distillate - TN324286 - D001-100%		d.		e.		
c. TBAH Mother Liquor - TN324290 - D001, D002 100%		e.		f.		
d. Toluene - TN003235 - F005 - 100%		f.		g.		
15. Special Handling Instructions and Additional Information IF Undeliverable Return To Generator 24 Hr. Emergency Contact: Monsanto Co - (314) 622-1516						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.						
Printed/Typed Name Richard Ligenig		Signature Richard Ligenig		Month Day Year 10/31/97		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Tim Henderson		Month Day Year 10/31/97		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name Billy Brooks		Signature Billy Brooks		Month Day Year 10/31/97		

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HAZARDOUS WASTE MANIFEST

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Form Approved OMB No 2050-0039, Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M.O.D.00495411197010	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is required by State law.	
3. Generator's Name and Mailing Address Monsanto Co 1700 South Second Street, St Louis, MO 63177		4. Generator's Phone (314) 622-1516 Richard Koenig		5. Transporter 1 Company Name Allworth of Tennessee		
6. US EPA ID Number TN0981920119		7. Transporter 2 Company Name		8. US EPA ID Number		
9. Designated Facility Name and Site Address Allworth of Tennessee 101 South Park Ave Mount Pleasant, TN 38474		10. US EPA ID Number TN0981920119		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		
12. Containers		13. Total Quantity		14. Unit Wt/Vol.		
a. Waste, Methanol Solution, 3, UN1230, PGII		001 DM		265 P		
b. Waste, Flammable Liquid, N.O.S. (Acetone, Methanol), 3, UN1993, PGIII		001 D.M.		4.58 P		
c. Waste, Paint, 3, UN1263, PGIII		0.01 D.F.		2.0 P		
d. Waste, Corrosive Liquid, N.O.S. (Potassium Hydroxide), 8, UN1760, PGII		005 DM		2,015 P		
j. Additional Descriptions for Materials Listed Above		k. HAZARDING CODE (IF APPLICABLE AND ONLY IF EXTENSIVE)		l. HAZARDING CODE (IF APPLICABLE AND ONLY IF EXTENSIVE)		
a. Duralin K Methanol and Water - TN003278 - F003/F005, D002-1004		b. Lab Solvents - TN003091 - F003, F005, D002-1004		c. Out Dated Cans of Paint - TN003237 - D001, D008-1006		
d. Potassium Hydroxide Wash - TN324284 - D002-1004						
15. Special Handling Instructions and Additional Information IF Undiscoverable, Return to Generator 24 Hr. Emergency Contact: Monsanto Co. (314) 622-1516						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.						
Printed/Typed Name Richard Koenig		Signature Richard Koenig		Month Day Year 10/31/97		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Tim Henderson		Month Day Year 10/31/97		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name Billy Brooks		Signature Billy Brooks		Month Day Year 10/31/97		

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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page of	Information in the shaded areas is required by State law.	
3. Generator's Name and Mailing Address Monson Co. 1700 South Second Street, St. Louis, MO. 63177		MO.D.D. 4954.1.1.1970.1.1		A. Missouri Manifest Document Number 0010002 001.1		
4. Generator's Phone (314) 622-1400 c/o Rich Genie		6. US EPA ID Number TN.D.9.8.1.92.0.1.1.9		B. DOT Reg. No. Address H781 TX-188-54 (615) 329-8000		
5. Transporter 1 Company Name Allworth of Tennessee		8. US EPA ID Number				
7. Transporter 2 Company Name		10. US EPA ID Number				
9. Designated Facility Name and Site Address Allworth of Tennessee 101 South Park Ave Mount Pleasant, TN 38474		10. US EPA ID Number TN.D.9.8.1.9.26.1.1.9				
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol.	
a. HM Waste, Corrosive Liquid, N.O.S. (Potassium Hydroxide) 8, UN1760, PGII		001 DM		242 P		
b. X Waste, Corrosive Liquid, N.O.S. (Sodium Hydroxide), 8, UN1760, PGIII		006 DM		2502 P		
c. X Waste, Maleic Anhydride, 8, UN2215 PGIII		005 DF		1800 P		
d. X Hazardous Waste, Liquid, N.O.S. (D005, D018), 9, NA 7062, PGIII		37 RK 028 DM		2169.3 P		
j. Additional Descriptions for Materials Listed Above		k. HANDLING CODE (FACILITY USE ONLY)				
a. NC-45 Mother Lye - TN 324289 - D002 - 100%		a. 1 1 1 1 1 1 1 1 1 1				
b. Caustic Rinse Water - TN 002976 - D002 - 100%		b. 1 1 1 1 1 1 1 1 1 1				
c. Maleic Anhydride - TN 002975 - U147 - 100%		c. 1 1 1 1 1 1 1 1 1 1				
d. Mixed Hydraulic Fluid - TN 003090 - D005, D006, D018 - 100%		d. 1 1 1 1 1 1 1 1 1 1				
15. Special Handling Instructions and Additional Information 24 Hr. Emergency Contact: Monson Co. (314) 622-1516 IF Undeliverable, Return To Generator						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.						
Printed/Typed Name Richard L Genie		Signature Richard Genie		Month Day Year 10/31/1997		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Tim Henderson		Signature Tim Henderson		Month Day Year 10/31/1997		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Billy Brooks						
Signature Billy Brooks		Month Day Year 10/31/1997				

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HAZARDOUS WASTE MANIFEST

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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page of	Information in the shaded areas is required by State law.	
3. Generator's Name and Mailing Address MONSANTO Co. 1700 South Second Street, St Louis, MO. 63177		MO.D.O.O. 49541111970113		A. Missouri Manifest Document Number 0010102 00013		
4. Generator's Phone (314) 622-1400 c/o Rich Koenig		6. US EPA ID Number TN.D.9.8.1.9.2.0.1.1.9		B. U.S. (Gen. Site Address) Same		
5. Transporter 1 Company Name Allworth of Tennessee		8. US EPA ID Number		C. U.S. (Fac. Site Address) H.17861 TD- Y88-912 145709-2601		
7. Transporter 2 Company Name		10. US EPA ID Number		D. U.S. (Fac. Site Address)		
9. Designated Facility Name and Site Address Allworth of Tennessee 101 South Park Ave Mount Pleasant, TN: 38474		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		E. U.S. (Fac. Site Address)		
		12. Containers		13. Total Quantity		
		Number Type		Unit Wt/Vol.		
a. Used Oil, Not Hazardous Under DOT or EPA		0.04 PM		12.8.3 P		
b. Non Hazardous Waste		00.1 DF		5.0 P		
c. Non Hazardous Waste		00.1 DF		1.7.5 P		
d. Non Hazardous Waste		0.1.0 DM		4.1.70 P		
J. Additional Descriptions for Materials Listed Above		K. HANDLING CODES (FACILITY USE ONLY)		L. COMMENTS		
a. Used oil - TN 003092 - 0095-100%		a.		a.		
b. Zorbil and Durulink - TN 321441		b.		b.		
c. Zorbil and RK MPPC contaminated with Zorbil - TN 003282		c.		c.		
d. Drum Rinse Water - TN 002949		d.		d.		
15. Special Handling Instructions and Additional Information IF Undeliverable, Return To Generator 24 Hr. Emergency Contact: MONSANTO G. (314) 622-1516						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.						
Printed/Typed Name Richard Koenig		Signature Richard Koenig		Month Day Year 10/31/1997		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Tim Henderson		Month Day Year 10/31/1997		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name Billy Braks		Signature Billy Braks		Month Day Year 10/31/1997		

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MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality

Hazardous Waste Program

P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

3-3147R

EMERGENCY RESPONSE  
U.S. COAST GUARD  
1-800-424-8802  
CHEM TREC  
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DEPT. OF NATURAL RESOURCES  
314-634-2436

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039, Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page of	Information in the shaded areas is required by State law.	
3. Generator's Name and Mailing Address Monsanto Co. 1700 South Second Street, St. Louis, MO 63177		M.O.D. 0.04954.11.119.7.01.5		1	0.04954.11.119.7.01.5	
4. Generator's Phone (314) 622-1400		go Rich Koenig				
5. Transporter 1 Company Name Allworth of Tennessee		6. US EPA ID Number TN.D.98.1.92.01.19				
7. Transporter 2 Company Name		8. US EPA ID Number				
9. Designated Facility Name and Site Address Allworth of Tennessee 101 South Park Ave. Mount Pleasant, TN 38474		10. US EPA ID Number TN.D.98.1.92.01.19				
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM Waste, Hydrogen Peroxide, Aqueous Solution with less than 20 percent but more than 40 percent Hydrogen Peroxide, S.I., UN2014, PG-II		12. Containers Number Type		13. Total Quantity	14. Unit Wt/Vol.	
		0.01 DF		8.6	P	
15. Special Handling Instructions and Additional Information IF Undeliverable, Return To Generator (314) 622-1516 24 Hr. Emergency Contact: Monsanto						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.						
Printed/Typed Name Richard L. Koenig		Signature Richard L. Koenig		Month Day Year 10/31/1997		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Tim Henderson		Signature Tim Henderson		Month Day Year 10/31/1997		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Billy Brooks		Signature Billy Brooks		Month Day Year 10/31/1997		

# Hazardous Waste Storage Inventory

Location \_\_\_\_\_

Waste in storage at time of inspection, are the rows with "no Date Removed" will

Date Added	Waste Description	EPA ID # (a)	PROD	QUANTITY	Signature	Date Removed & Disposition			Signature
1-6-97	Hydraulic Fluid Cartridge	—	✓	3	Richard Koenig	TN 2-2097			Richard Koenig
1-6-97	Protective Gear	—	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
1-6-97	Hydraulic Fluid	0005,0006 DOLK	✓	5	Richard Koenig	TN 2-2097			Richard Koenig
1-7-97	Maleic Anhydride	V147	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
1-7-97	Hydraulic Fluid	0005,0006 DOLK	✓	3	Richard Koenig	TN 2-2097			Richard Koenig
1-7-97	Hydraulic Fluid Cartridge	—	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
1-14-97	L-Aspartic Filter Cartridge	—	✓	2	Richard Koenig	TN 2-2097			Richard Koenig
1-14-97	Protective Gear	—	✓	10	Richard Koenig	TN 2-2097			Richard Koenig
1-21-97	Hydraulic Fluid	0005,0006 DOLK	✓	6	Richard Koenig	TN 2-2097			Richard Koenig
1-21-97	Maleic Anhydride	V147	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
1-21-97	Protective Gear	—	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
1-21-97	Hydraulic Fluid Cartridge	—	✓	2	Richard Koenig	TN 2-2097			Richard Koenig
1-23-97	Lab Solvents	0022 F003, F005	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
1-28-97	Lab Crushed Glass	—	✓	1	Richard Koenig	Emelle 3-2097			Richard Koenig
1-28-97	Protective Gear	—	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
1-28-97	L-Aspartic Filter Cartridge	—	✓	2	Richard Koenig	TN 2-2097			Richard Koenig
1-28-97	L-Aspartic Acid	—	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
1-28-97	Maleic Anhydride	V147	✓	2	Richard Koenig	TN 2-2097			Richard Koenig
2-3-97	L-Aspartic Filter Cartridge	—	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
2-3-97	Maleic Anhydride	V147	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
2-6-97	Lab Glass	—	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
2-6-97	Hydraulic Fluid Cartridge	—	✓	2	Richard Koenig	TN 2-2097			Richard Koenig
2-6-97	Hydraulic Fluid	0005,0006 DOLK	✓	6	Richard Koenig	TN 2-2097			Richard Koenig

10-1

# Hazardous Waste Storage Inventory

Location East of DDD Bldg

Date Added	Waste Description	EPA ID # (a)	Priority	Quantity	Signature	Date Removed & Disposition			Signature
2-6-97	Protective Gear	—	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
2-6-97	Waste Oil	D098	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
2-6-97	Lab Solvents	D022, F003 F005	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
2-7-97	Hydraulic Fluid	D005, D006 D008	✓	4	Richard Koenig	TN (2) 2-2097	(2) 3-1397		Richard Koenig / Koenig
2-11-97	Maleic Anhydride	V147	✓	2	Richard Koenig	TN 2-2097			Richard Koenig
2-11-97	Protective Gear	—	✓	5	Richard Koenig	TN 2-2097			Richard Koenig
2-11-97	Triethylamine	D001	✓	1	Richard Koenig	2-2097 TN			Richard Koenig
2-11-97	Potassium Hydroxide Wash	D002	✓	12	Richard Koenig	2-2097 (7) TN	(5) TN 3-1397		Richard Koenig / Koenig
2-11-97	Diphenyl Oxide	—	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
2-11-97	Gulfene 16	—	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
2-11-97	Acetone	F003	✓	19	Richard Koenig	TN (14) 2-2097	(5) TN 3-1397		Richard Koenig / Koenig
2-11-97	Cyclohexane Washout	D001	✓	4	Richard Koenig	TN 2-2097			Richard Koenig
2-11-97	ADPO Acetone	F003	✓	4	Richard Koenig	TN 2-2097			Richard Koenig
2-11-97	Ethyl Acetate Distillate	D001	✓	5	Richard Koenig	TN (3) 2-2097	(2) TN 3-1397		Richard Koenig / Koenig
2-11-97	TBAH Mother Liquor	D001 D002	✓	2	Richard Koenig	TN (1) 2-2097	(1) TN 3-1397		Richard Koenig / Koenig
2-11-97	TEA/HCL Solution	D001 D002	✓	2	Richard Koenig	TN 2-2097			Richard Koenig
2-11-97	Triethylamine Distillate	D001	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
2-11-97	Toluene	F005	✓	3	Richard Koenig	TN (2) 2-2097	(1) TN 3-1397		Richard Koenig / Koenig
2-11-97	PSI Acetone	F003	✓	1	Richard Koenig	TN 2-2097			Richard Koenig
2-11-97	NC-45 Mother Liquor	D002	✓	1	Richard Koenig	TN 3-1397			Richard Koenig
2-11-97	OS-124 Alumina Water	—	✓	1	Richard Koenig	TN 3-1397			Richard Koenig
2-12-97	L-Aspartic Filter Cartridge	—	✓	2	Richard Koenig	TN 2-2097			Richard Koenig
2-14-97	L-Aspartic Filter Cartridge	—	✓	1	Richard Koenig	TN 2-2097			Richard Koenig

10-2

# Hazardous Waste Storage Inventory

Location \_\_\_\_\_

Date Added	Waste Description	EPA ID # (s)	PIST	PIOS	Quantity	Signature	Date Removed & Disposition			Signature
2-18-97	Hydraulic Fluid	D005 18006 D018	✓		1	Richard Koenig	TN 3-13-97			Richard Koenig
2-19-97	Hydraulic Fluid Cartridge	—		✓	1	Richard Koenig	TN 3-13-97			Richard Koenig
2-19-97	Hydraulic Fluid	D005, D006 D018	✓		5	Richard Koenig	TN 3-13-97			Richard Koenig
2-20-97	Hydraulic Fluid	D005, D006 D018	✓		3	Richard Koenig	TN 3-13-97			Richard Koenig
2-20-97	Hydraulic Fluid Cartridge	—		✓	2	Richard Koenig	TN 3-13-97			Richard Koenig
2-20-97	Protective Gear	—		✓	1	Richard Koenig	TN 3-13-97			Richard Koenig
2-21-97	Hydraulic Fluid	D005, D006 D018	✓		1	Richard Koenig	TN 3-13-97			Richard Koenig
3-3-97	Hydraulic Fluid	D005, D006 D018	✓		5	Richard Koenig	TN 3-13-97			Richard Koenig
3-3-97	Duralink Methanol	F003	✓		1	Richard Koenig	TN 3-13-97			Richard Koenig
3-3-97	L-Aspartic Filter Cartridge	—		✓	2	Richard Koenig	TN 3-13-97			Richard Koenig
3-3-97	Protective Gear	—		✓	2	Richard Koenig	TN 3-13-97			Richard Koenig
3-3-97	Hydraulic Filter Cartridge	—		✓	3	Richard Koenig	TN 3-13-97			Richard Koenig
3-3-97	Oil	D098	✓		1	Richard Koenig	TN 3-13-97			Richard Koenig
3-3-97	Zorbull/Duralink	—		✓	1	Richard Koenig	TN 3-13-97			Richard Koenig
3-3-97	MPP Contaminated Zorbull	—		✓	1	Richard Koenig	TN 3-13-97			Richard Koenig
3-4-97	Protective Gear	—		✓	5	Richard Koenig	TN 3-13-97			Richard Koenig
3-4-97	Lab Solvents	F003, F005 D022	✓		1	Richard Koenig	TN 3-13-97			Richard Koenig
3-4-97	Hydraulic Fluid	D005, D006 D018	✓		1	Richard Koenig	TN 3-13-97			Richard Koenig
3-6-97	Hydraulic Fluid	D005, D006 D018	✓		8	Richard Koenig	TN 3-13-97			Richard Koenig
3-6-97	Caustic Rinse Water	D012	✓		6	Richard Koenig	TN 3-13-97			Richard Koenig
3-6-97	Drum Rinse Water	—		✓	10	Richard Koenig	TN 3-13-97			Richard Koenig
3-6-97	Used Oil	D098	✓		3	Richard Koenig	TN 3-13-97			Richard Koenig
3-6-97	Lubricating Oil	—		✓	2	Richard Koenig	TN 3-13-97			Richard Koenig

10-3

# Hazardous Waste Storage Inventory

Location \_\_\_\_\_

Date Added	Waste Description	EPA ID # (s)	Priority	Quantity	Signature	Date Removed & Disposition			Signature
3-6-97	L-Aspartic Acid	—	✓	1	Richard Koenig	TN 3-13-97			Richard Koenig
3-6-97	Maleic Anhydride	U147	✓	5	Richard Koenig	TN 3-13-97			Richard Koenig
3-6-97	Outdated cans of Paint	D001	✓	1	Richard Koenig	TN 3-13-97			Richard Koenig
3-11-97	Hydraulic Fluid	D005, D006 D018	✓	11	Richard Koenig	TN 3-13-97			Richard Koenig
3-11-97	Hydraulic Fluid Filter Cartridge	—	✓	4	Richard Koenig	TN 3-13-97			Richard Koenig
3-11-97	Protective Gear	—	✓	2	Richard Koenig	TN 3-13-97			Richard Koenig
3-11-97	L-Aspartic Filter Cartridge	—	✓	2	Richard Koenig	TN 3-13-97			Richard Koenig
3-12-97	Duralink Salt Filter Material	—	✓	2	Richard Koenig	TN 3-13-97			Richard Koenig
3-12-97	Duralink Water Filter	—	✓	1	Richard Koenig	TN 3-13-97			Richard Koenig
3-12-97	Hydrogen Peroxide	D001	✓	1	Richard Koenig	TN 3-13-97			Richard Koenig
3-12-97	Lab Crushed Glass	—	✓	1	Richard Koenig	Emergency 3-20-97			Richard Koenig
3-13-97	Hydraulic Fluid	D005, D006 D018	✓	2	Richard Koenig	TN 5-1-97			Richard Koenig
3-14-97	Hydraulic Fluid	D005, D006 D018	✓	2	Richard Koenig	TN 5-1-97			Richard Koenig
3-14-97	Maleic Anhydride	U147	✓	1	Richard Koenig	TN 5-1-97			Richard Koenig
3-17-97	Protective Gear	—	✓	1	Richard Koenig	TN 5-1-97			Richard Koenig
3-20-97	Protective Gear	—	✓	4	Richard Koenig	TN 5-1-97			Richard Koenig
3-20-97	Used Oil	D098	✓	3	Richard Koenig	TN 5-1-97			Richard Koenig
3-20-97	L-Aspartic Cartridge	—	✓	2	Richard Koenig	TN 5-1-97			Richard Koenig
3-20-97	L-Aspartic Acid	—	✓	2	Richard Koenig				Richard Koenig
3-20-97	Lab Glass	— RK	✓	1	Richard Koenig	TN 5-1-97			Richard Koenig
3-20-97	Lab Solvents	D022, D003 D018	✓	1	Richard Koenig	TN 5-1-97			Richard Koenig
3-21-97	Hydraulic Fluid	D005, D006 D018	✓	3	Richard Koenig	TN 5-1-97			Richard Koenig
3-21-97	Hydraulic Fluid Cartridge	—	✓	6	Richard Koenig	TN 5-1-97			Richard Koenig

10-4

# Hazardous Waste Storage Inventory

Location \_\_\_\_\_

Date Added	Waste Description	EPA ID # (s)	Priority	Quantity	Signature	Date Removed & Disposition			Signature
3-31-97	Lab Glass	—	✓	8	Richard Koenig	TN 5-1-97			Richard Koenig
3-31-97	L-Aspartic Acid	—	✓	4	Richard Koenig	TN 5-1-97			Richard Koenig
4-1-97	Hydraulic Fluid	0005, 0006 D018	✓	1	Richard Koenig	TN 5-1-97			Richard Koenig
4-2-97	Protective Gear	—	✓	1	Richard Koenig	TN 5-1-97			Richard Koenig
4-2-97	Maleic Anhydride	U147	✓	1	Richard Koenig	TN 5-1-97			Richard Koenig
4-3-97	L-Aspartic Filter Cartridge	—	✓	1	Richard Koenig	TN 5-1-97			Richard Koenig
4-3-97	Hydraulic Fluid	0005, 0006 D018	✓	3	Richard Koenig	TN 5-1-97			Richard Koenig
4-3-97	Used Oil	0098	✓	1	Richard Koenig	TN 5-1-97			Richard Koenig
4-7-97	Used Oil	0098	✓	1	Richard Koenig	TN 5-1-97			Richard Koenig
4-8-97	Hydraulic Fluid	0005, 0006 D018	✓	8	Richard Koenig	TN 5-1-97			Richard Koenig
4-8-97	Hydraulic Fluid Cartridge	—	✓	4	Richard Koenig	TN 5-1-97			Richard Koenig
4-8-97	Puralka Floor Sweepings	—	✓	2	Richard Koenig	TN 5-1-97			Richard Koenig
4-8-97	Maleic Anhydride	U147	✓	1	Richard Koenig	TN 5-1-97			Richard Koenig
4-9-97	Hydraulic Fluid Cartridge	—	✓	2	Richard Koenig	TN 5-1-97			Richard Koenig
4-9-97	L-Aspartic Filter Cartridge	—	✓	1	Richard Koenig	TN 5-1-97			Richard Koenig
4-9-97	Hydraulic Fluid	0005, 0006 D018	✓	10	Richard Koenig	TN 5-1-97			Richard Koenig
4-11-97	OS-138 KOH Residue/Keel	D002	✓	1	Richard Koenig	TN 4-15-97			Richard Koenig
4-11-97	OS-138 PCE	F003	✓	6	Richard Koenig	TN 4-15-97			Richard Koenig
4-11-97	PCE and Alumina	F003	✓	1	Richard Koenig	TN 4-15-97			Richard Koenig
4-11-97	m-Dichlorobenzene	—	✓	20	Richard Koenig	TN 4-15-97			Richard Koenig
4-11-97	PCE/MPP	F003	✓	1	Richard Koenig	TN 4-15-97			Richard Koenig
4-11-97	MPP/PCE	D039	✓	14	Richard Koenig	TN 4-15-97			Richard Koenig
4-11-97	Used Oil	D098	✓	3	Richard Koenig	TN 4-15-97			Richard Koenig

# Hazardous Waste Storage Inventory

Location \_\_\_\_\_

Date Added	Waste Description	EPA ID # (s)	PICT	QTY	Quantity	Signature	Date Removed & Disposition			Signature
4-11-97	OS-138 Oil	D098	✓	2	2	Richard Koenig	TN 4-15-97			Richard Koenig
4-11-97	OS-138 Filter Cartridge	—	✓	1	1	Richard Koenig	TN 4-15-97			Richard Koenig
4-11-97	3-Ring Chloroether	—	✓	4	4	Richard Koenig	TN 4-15-97			Richard Koenig
4-11-97	OS-124 Alumina Cake	—	✓	4	4	Richard Koenig	TN 4-15-97			Richard Koenig
4-11-97	OS-138 Hi Vac Material	—	✓	2	2	Richard Koenig	TN 4-15-97			Richard Koenig
4-11-97	OS-138 3 Ring Ether	—	✓	2	2	Richard Koenig	TN 4-15-97			Richard Koenig
4-11-97	Recovered MPP	—	✓	9	9	Richard Koenig	TN 4-15-97			Richard Koenig
4-11-97	OS-138 3 Ring Chloroether	—	✓	5	5	Richard Koenig	TN 4-15-97			Richard Koenig
4-11-97	OS-138 Filter Cake	—	✓	1	1	Richard Koenig	TN 4-15-97			Richard Koenig
4-15-97	Hydraulic Fluid	D005, D006, D018	✓	4	4	Richard Koenig	TN 5-1-97			Richard Koenig
4-15-97	Hydraulic Fluid Filter Cartridge	—	✓	5	5	Richard Koenig	TN 5-1-97			Richard Koenig
4-18-97	Hydraulic Fluid	D005, D006, D018	✓	3	3	Richard Koenig	TN 5-1-97			Richard Koenig
4-18-97	Maleic Anhydride	U147	✓	1	1	Richard Koenig	TN 5-1-97			Richard Koenig
4-18-97	Protective Gear	—	✓	2	2	Richard Koenig	TN 5-1-97			Richard Koenig
4-18-97	Hydraulic Fluid	D005, D006, D018	✓	3	3	Richard Koenig	TN 5-1-97			Richard Koenig
4-22-97	Lab Solvents	D002, F003, F005	✓	1	1	Richard Koenig	TN 5-1-97			Richard Koenig
4-22-97	Hydraulic Fluid	D005, D006, D018	✓	6	6	Richard Koenig	TN 5-1-97			Richard Koenig
4-22-97	L-Aspartic Cartridge	—	✓	2	2	Richard Koenig	TN 5-1-97			Richard Koenig
4-22-97	Protective Gear	—	✓	1	1	Richard Koenig	TN 5-1-97			Richard Koenig
4-22-97	Hydraulic Fluid Cartridge	—	✓	2	2	Richard Koenig	TN 5-1-97			Richard Koenig
4-25-97	Hydraulic Fluid	D005, D006, D018	✓	1	1	Richard Koenig	TN 5-1-97			Richard Koenig
4-25-97	Hydraulic Fluid Cartridge	—	✓	3	3	Richard Koenig	TN 5-1-97			Richard Koenig
4-29-97	H. N. 1. T. 0	D005, D006, D018	✓	2	2	R. Koenig	TN 5-1-97			R. Koenig

10-6

# Hazardous Waste Storage Inventory

Location \_\_\_\_\_

Date Added	Waste Description	EPA ID # (s)	Quantity	Signature	Date Removed & Disposition	Signature
4-29-97	Hydraulic Fluid Cartridge	—	3	Richard Kenney	5-8-97 TN	Richard Kenney
4-29-97	Lab Glass - Crushed	—	1	Richard Kenney	Emelle 5-16-97	Richard Kenney
4-29-97	L-Aspartic Cartridge	—	1	Richard Kenney	TW 5-1-97	Richard Kenney
4-29-97	Protective Gear	—	2	Richard Kenney	TN 5-1-97	Richard Kenney
4-30-97	Chloro sulfonyl Isocyanate	D002, D003	4	Richard Kenney	TN 5-1-97	Richard Kenney
4-30-97	TBAA	—	1	Richard Kenney	TN 5-1-97	Richard Kenney
4-30-97	OS-138 Tank Cleanout	D002	9	Richard Kenney		
4-30-97	Thermal Tank Cleanout	D002, D018	7	Richard Kenney		
5-6-97	Hydraulic Fluid Cartridge	—	2	Richard Kenney		
5-6-97	L-Aspartic Filter Cartridge	—	2	Richard Kenney		
5-6-97	Maleic Anhydride	D147	2	Richard Kenney		
5-6-97	Lab Solvent	D022, F003 F005	1	Richard Kenney		
5-7-97	Hydraulic Fluid	D015, D016, D018	8	Richard Kenney		
5-9-97	Hydraulic Fluid	D018 D005 D006	2	Richard Kenney		
5-9-97	Hydraulic Fluid Cartridge	—	1	Richard Kenney		
5-9-97	L-Aspartic Cartridge	—	1	Richard Kenney		
5-9-97	Zorboll / Thermal 66	D018	1	Richard Kenney		
5-13-97	Lab Material	—	1	Richard Kenney		
5-13-97	Aemsal Cans	D001	3	Richard Kenney		
5-13-97	OS-138 Filter Cake	—	1	Richard Kenney		
5-13-97	MPP Wash Water	—	1	Richard Kenney		
5-13-97	Regular Batteries	—	1	Richard Kenney		
5-13-97	P.I.I.C.	—	1	D.P. Okie		

Caustic according to Chem 100

10-7

### Location

[illegible]

8-01

# Hazardous Waste Storage Inventory

Location \_\_\_\_\_

Date Added	Waste Description	EPA ID # (s)	Priority	Quantity	Signature	Date Removed & Disposition			Signature
4-16-96	Caustic Rinse Water	D002	✓	2	Richard Koenig	TN 5-8-96			Richard Koenig
4-19-96	Hydraulic Fluid Cartridge	—	✓	1	Richard Koenig	TN 5-8-96			Richard Koenig
4-19-96	Hydraulic Fluid	D005, D006 D015	✓	1	Richard Koenig	TN 5-8-96			Richard Koenig
4-22-96	Oil	D005, D008 D039	✓	1	Richard Koenig	TN 5-8-96			Richard Koenig
4-22-96	PNPT / NMP	—	✓	1	Richard Koenig	TN 5-8-96			Richard Koenig
4-22-96	Grease	—	✓	1	Richard Koenig	TN 5-8-96			Richard Koenig
4-22-96	CLS Cleaning Solution	—	✓	4	Richard Koenig	TN 5-8-96			Richard Koenig
4-22-96	Chloro 3 Ring Phenol Quench	D002	✓	6	Richard Koenig	TN 5-8-96			Richard Koenig
4-24-96	Maleic Anhydride	U147	✓	2	Richard Koenig	TN 5-8-96			Richard Koenig
4-24-96	Hydraulic Fluid	D005, D006 D039	✓	8	Richard Koenig	TN 5-8-96			Richard Koenig
4-24-96	Drum Rinse Water	—	✓	6	Richard Koenig	TN 5-8-96			Richard Koenig
4-24-96	Caustic Rinse Water	D002	✓	4	Richard Koenig	TN 5-8-96			Richard Koenig
4-24-96	Hydraulic Fluid Cartridge	—	✓	4	Richard Koenig	TN 5-8-96			Richard Koenig
4-26-96	Lab Glass	—	✓	1	Richard Koenig	TN 5-8-96			Richard Koenig
4-30-96	Duralink Water Filter	—	✓	1	Richard Koenig	TN 5-8-96			Richard Koenig
5-2-96	OS-124 Alumina Cake	—	✓	1	Richard Koenig	TN 5-8-96			Richard Koenig
5-2-96	L-Aspartic Filter Cartridge	—	✓	1	Richard Koenig	TN 5-8-96			Richard Koenig
5-2-96	Contaminated Protective Gear	—	✓	2	Richard Koenig	TN 5-8-96			Richard Koenig
5-2-96	Hydraulic Fluid Cartridge	—	✓	5	Richard Koenig	TN 5-8-96			Richard Koenig
5-3-96	Protective Gear	—	✓	1	Richard Koenig	TN 5-8-96			Richard Koenig
5-3-96	Hydraulic Fluid Cartridge	—	✓	2	Richard Koenig	TN 5-8-96			Richard Koenig
5-6-96	Polysuccinimide	—	✓	4	Richard Koenig	TN 5-8-96			Richard Koenig
5-6-96	Acetone	D001, F005	✓	5	Richard Koenig	TN 5-8-96			Richard Koenig

# Hazardous Waste Storage Inventory

Location

Date Added	Waste Description	EPA ID (#)	PRECIPITATION	STATUS	Quantity	Signature	Date Removed & Disposition			Signature
5-6-96	Toluene	D001, F005	✓		2	Richard Kenney	TN 5-8-96			Richard Kenney
5-6-96	MUN 70600 Filtrate Wash	D002	✓		26	Richard Kenney	TN 5-8-96			Richard Kenney
5-6-96	Sontowax Maltex liquor	D001, F005	✓		2	Richard Kenney	TN 5-8-96			Richard Kenney
5-6-96	Acetic Acid	D002	✓		5	Richard Kenney	TN 6-5-96			Richard Kenney
5-6-96	Scrubber Solution	D002	✓		12	Richard Kenney	TN 6-5-96			Richard Kenney
5-7-96	Lab Solvents	D001, D023, F003, F005	✓		1	Richard Kenney	TN 5-8-96			Richard Kenney
5-7-96	Hydraulic Fluid	D005, D006, D018	✓		3	Richard Kenney	TN 5-8-96			Richard Kenney
5-7-96	L-Aspartic Filter Cartridge	—	✓		1	Richard Kenney	TN 5-8-96			Richard Kenney
5-8-96	Sodium Bromide/Sodium Sulfate	—	✓		2	Richard Kenney	TN 6-5-96			Richard Kenney
5-14-96	Oil	D005, D029, D048	✓		1	Richard Kenney	TN 6-5-96			Richard Kenney
5-15-96	Hydraulic Fluid	D005, D006, D018	✓		2	Richard Kenney	TN 6-5-96			Richard Kenney
5-15-96	Lab Solvent	D001, D023, F003, F005	✓		1	Richard Kenney	6-5-96 TN			Richard Kenney
5-15-96	Maleic Anhydride	V147	✓		1	Richard Kenney	6-5-96 TN			Richard Kenney
5-15-96	Protective Gear	—	✓		1	Richard Kenney	6-5-96 TN			Richard Kenney
5-15-96	Hydraulic Fluid Cartridge	—	✓		3	Richard Kenney	6-5-96 TN			Richard Kenney
5-15-96	Crushed Glass	—	✓		1	Richard Kenney	Emelle 6-6-96			Richard Kenney
5-16-96	Hydraulic Fluid	D005, D006, D018	✓		4	Richard Kenney	TN 6-5-96			Richard Kenney
5-17-96	Hydraulic Fluid Cartridge	—	✓		1	Richard Kenney	TN 6-5-96			Richard Kenney
5-17-96	Lab Glass Jars	—	✓		12	Richard Kenney	TN 6-5-96			Richard Kenney
5-17-96	Hydraulic Fluid	D005, D006, D018	✓		3	Richard Kenney	TN 6-5-96			Richard Kenney
5-22-96	L-Aspartic Cartridge	—	✓		2	Richard Kenney	TN 6-5-96			Richard Kenney
5-22-96	Hydraulic Fluid Cartridge	—	✓		3	Richard Kenney	TN 6-5-96			Richard Kenney
5-22-96	Hydraulic Fluid	D005, D006, D018	✓		1	Richard Kenney	TN 6-5-96			Richard Kenney

INSTRUCTIONS FOR THE COM-  
PLETION OF THIS FORM ARE ON A  
SEPARATE SHEET.

THIS DOCUMENT MUST BE USED  
FOR ALL MISSOURI-DESTINED  
SHIPMENTS.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality

Hazardous Waste Program

P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE  
U.S. COAST GUARD  
1-800-424-8802  
CHEM TREC  
1-800-424-9300  
DEPT. OF NATURAL RESOURCES  
314-634-2436

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039. Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M0000495411196045	Manifest Document No. 5-646RIC	2. Page of 1	Information in the shaded areas is required by State law.
3. Generator's Name and Mailing Address Monsanto Co. 1700 South Second Street, St. Louis, MO. 63177		4. Generator's Phone (314) 622-1400 c/o Rich Koenig		5. Transporter 1 Company Name Allworth of Tennessee	
6. US EPA ID Number TN0981920119		7. Transporter 2 Company Name		8. US EPA ID Number	
9. Designated Facility Name and Site Address Allworth of Tennessee 101 South Park Ave. Mount Pleasant, TN. 38474		10. US EPA ID Number TN0981920119		11. Facility's Phone (615) 379-2800	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol.
a. <input checked="" type="checkbox"/> Waste, Flammable Liquid, N.O.S. (Toluene), 3, UN1993, PG II		002 DM		7.95	P
b. <input checked="" type="checkbox"/> Waste, Corrosive Liquid, N.O.S. (Sodium Hydroxide), 8, UN1760, PG II		006 DM		2.992	P
c. <input checked="" type="checkbox"/> Waste, Corrosive Liquid, N.O.S. (Potassium Hydroxide), 8, UN1760, PG II		006 DM		3.850	P
d. <input checked="" type="checkbox"/> Waste, Corrosive Liquid, N.O.S. (Acetic Acid), 8, UN1760, PG II		026 DM		10.05	IP
15. Special Handling Instructions and Additional Information 24 Hr. Emergency Contact: Monsanto Co. (314) 622-1516 IF Undeliverable, Return To Generator					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.					
Printed/Typed Name Richard L Koenig		Signature R. L. Koenig		Month Day Year 10/10/81	
17. Transporter 1 Acknowledgment of Receipt of Materials Printed/Typed Name Gary LAWRENCE		Signature Gary Lawrence		Month Day Year 05/08/86	
18. Transporter 2 Acknowledgment of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name DAVID F. BIER		Signature David F. Bier		Month Day Year 05/27/86	

GENERATOR FINAL COPY - PART 2

THIS COPY MUST BE RETAINED BY THE GENERATOR AFTER ITS RETURN FROM

## Hazardous Reactions

## Reactivities and Incompatibilities:

1. Inadvertent mixing of formaldehyde and hydrogen chloride could result in generation of bis(chloromethyl)ether, a potent human carcinogen. \*\*PEER REVIEWED\*\* [National Research Council. Prudent Practices for Handling Hazardous Chemicals in Laboratories. Washington, DC: National Academy Press, 1981. 30]
2. CESIUM ACETYLENE CARBIDE BURNS IN HYDROGEN CHLORIDE GAS. CESIUM CARBIDE IGNITES IN CONTACT WITH HYDROCHLORIC ACID UNLESS ACID IS DILUTE. \*\*PEER REVIEWED\*\* [National Fire Protection Association. Fire Protection Guide on Hazardous Materials. 9th ed. Boston, MA: National Fire Protection Association, 1986.,p. 491M-50]
3. LITHIUM SILICIDE IN CONTACT WITH HYDROGEN CHLORIDE BECOMES INCANDESCENT. WHEN DILUTE HYDROCHLORIC ACID IS USED, GAS SPONTANEOUSLY FLAMMABLE IN AIR IS EVOLVED. MAGNESIUM BORIDE ... TREATED WITH CONCEN HYDROCHLORIC ACID PRODUCES SPONTANEOUSLY FLAMMABLE GAS. \*\*PEER REVIEWED\*\* [National Fire Protection Association. Fire Protection Guide on Hazardous Materials. 9th ed. Boston, MA: National Fire Protection Association, 1986.,p. 491M-120]
4. RUBIDIUM ACETYLENE CARBIDE BURNS WITH SLIGHTLY WARM HYDROCHLORIC ACID OR WITH MOLTEN SULFUR. RUBIDIUM CARBIDE IGNITES IN CONTACT WITH HYDROCHLORIC ACID UNLESS ACID IS DILUTE. \*\*PEER REVIEWED\*\* [National Fire Protection Association. Fire Protection Guide on Hazardous Materials. 9th ed. Boston, MA: National Fire Protection Association, 1986.,p. 491M-180]
5. URANIUM PHOSPHIDE REACTS WITH HYDROCHLORIC ACID TO RELEASE SPONTANEOUSLY FLAMMABLE PHOSPHINE. \*\*PEER REVIEWED\*\* [National Fire Protection Association. Fire Protection Guide on Hazardous Materials. 9th ed. Boston, MA: National Fire Protection Association, 1986.,p. 491M-221]
6. CALCIUM CARBIDE REACTS WITH HYDROGEN CHLORIDE GAS WITH INCANDESCENCE. \*\*PEER REVIEWED\*\* [National Fire Protection Association. Fire Protection Guide on Hazardous Materials. 9th ed. Boston, MA: National Fire Protection Association, 1986.,p. 491M-43]
7. INCR IN TEMP & PRESSURE OCCURRED WHEN EACH OF FOLLOWING CHEM WAS MIXED WITH HYDROCHLORIC ACID IN A CLOSED CONTAINER: ACETIC ANHYDRIDE, 2-AMINOETHANOL, AMMONIUM HYDROXIDE, CHLOROSULFONIC ACID, ETHYLENE DIAMINE, ETHYLENEIMINE, OLEUM, PROPIOLACTONE (BETA-), SODIUM HYDROXIDE, SULFURIC ACID, & VINYL ACETATE. \*\*PEER REVIEWED\*\* [National Fire Protection Association. Fire Protection Guide on Hazardous Materials. 9th ed. Boston, MA: National Fire Protection Association, 1986.,p. 491M-103]
8. CALCIUM PHOSPHIDE & HYDROCHLORIC ACID UNDERGO VERY ENERGETIC REACTION. \*\*PEER REVIEWED\*\* [National Fire Protection Association. Fire Protection Guide on Hazardous Materials. 9th ed. Boston, MA: National Fire Protection Association, 1986.,p. 491M-46]
9. Accidental addition of 6,500 liters of concn hydrochloric acid to a bulk sulfuric acid storage tank released sufficient hydrogen chloride by dehydration to cause the tank to explode violently. Complete dehydration of hydrochloric acid solution releases some 250 volumes of gas. \*\*PEER REVIEWED\*\* [Bretherick, L. Handbook of Reactive Chemical Hazards. 3rd ed. Boston, MA: Butterworths, 1985. 903]
10. ABSORPTION OF GASEOUS HYDROGEN CHLORIDE ON MERCURIC SULFATE BECOMES VIOLENT @ 125 DEG C. SODIUM REACTS VERY VIGOROUSLY WITH GASEOUS HYDROGEN CHLORIDE. \*\*PEER REVIEWED\*\* [National Fire Protection Association. Fire Protection Guide on Hazardous Materials. 9th ed. Boston, MA: National Fire Protection Association, 1986.,p. 491M-128]
11. REACTION OF SILVER PERCHLORATE WITH CARBON TETRACHLORIDE IN PRESENCE OF SMALL AMT OF HYDROCHLORIC ACID PRODUCES TRICHLOROMETHYL PERCHLORATE, WHICH DETONATES @ 40 DEG C. \*\*PEER REVIEWED\*\* [National Fire Protection Association. Fire Protection Guide on Hazardous Materials. 9th ed. Boston, MA: National Fire Protection Association, 1986.,p. 491M-186]
12. ... CONTACT WITH COMMON METALS PRODUCES HYDROGEN WHICH MAY FORM EXPLOSIVE MIXT WITH AIR. \*\*PEER REVIEWED\*\* [National Fire Protection Association. Fire Protection Guide on Hazardous Materials. 9th ed. Boston, MA: National Fire Protection Association, 1986.,p. 491M-87]
13. Hydroxides, amines, alkalis, copper, brass, zinc [Note: Hydrochloric acid is highly corrosive to most metals]. \*\*QC REVIEWED\*\* [NIOSH. NIOSH Pocket Guide to Chemical Hazards. DHHS (NIOSH) Publication No. 94-116. Washington, D.C.: U.S. Government Printing Office, June 1994. 166]

**Reactivities and Incompatibilities:**

1. DANGEROUS; WILL REACT WITH WATER OR STEAM TO PRODUCE CAUSTIC SOLN & HEAT. \*\*PEER REVIEWED\*\* [Sax, N.I. Dangerous Properties of Industrial Materials. 6th ed. New York, NY: Van Nostrand Reinhold, 1984. 1047]
2. Acids, water, metals (when wet), halogenated hydrocarbons, maleic anhydride [Note: Heat is generated if KOH comes in contact with H<sub>2</sub>O & CO<sub>2</sub> from the air]. \*\*QC REVIEWED\*\* [NIOSH. NIOSH Pocket Guide to Chemical Hazards. DHHS (NIOSH) Publication No. 94-116. Washington, D.C.: U.S. Government Printing Office, June 1994. 262]

**Reactivities and Incompatibilities:**

1. Incompatible with alkali metals, caustics, and amines at greater than 150 deg F. **\*\*PEER REVIEWED\*\*** [Sittig M; Handbook of Toxic and Hazardous Chemicals p.415 (1981)]
2. THE PRESENCE OF A RESIDUE OF WEAK SODIUM HYDROXIDE SOLN IN A PRESSURE VESSEL CAUSED MALEIC ANHYDRIDE TO DECOMPOSE IN A RUNAWAY EXPLOSIVE REACTION. ... ALKALI AND OTHER ALKALINE EARTH CMPD SUCH AS POTASSIUM, LITHIUM, CALCIUM, BARIUM AND MAGNESIUM CMPD, AS WELL AS AMINES AND OTHER NITROGEN CMPD WILL CAUSE EXPLOSIVE DECOMP OF MALEIC ANHYDRIDE. **\*\*PEER REVIEWED\*\*** [National Fire Protection Association. Fire Protection Guide on Hazardous Materials. 9th ed. Boston, MA: National Fire Protection Association, 1986., p. 491M-195]
3. Strong oxidizers, water, alkalis, metals, caustics & amines above 150 degrees F. [Note: Reacts slowly with water (hydrolyzes) to form maleic acid]. **\*\*QC REVIEWED\*\*** [NIOSH. NIOSH Pocket Guide to Chemical Hazards. DHHS (NIOSH) Publication No. 94-116. Washington, D.C.: U.S. Government Printing Office, June 1994. 188]

**Decomposition:**

1. Maleic anhydride decomposes exothermically, evolving carbon dioxide in the presence of dimethylamine, triethylamine, pyridine, or quinoline at temperatures above 150 deg C. **\*\*PEER REVIEWED\*\*** [Bretherick, L. Handbook of Reactive Chemical Hazards. 2nd ed. Boston MA: Butterworths, 1979. 462]

**Reactivities and Incompatibilities:**

1. CONTACT WITH SOME METALS CAN GENERATE HYDROGEN GAS. \*\*PEER REVIEWED\*\* [National Fire Protection Association. Fire Protection Guide on Hazardous Materials. 9th ed. Boston, MA: National Fire Protection Association, 1986., p. 49-83]
2. GENERATES CONSIDERABLE HEAT WHEN ... SOLN IS MIXED WITH ACID. \*\*PEER REVIEWED\*\* [The Merck Index. 10th ed. Rahway, New Jersey: Merck Co., Inc., 1983. 1236]
3. CRUDE HYDROQUINONE WAS PUMPED INTO SODIUM HYDROXIDE STORAGE TANK BY MISTAKE. THE HYDROQUINONE LIQUOR AT 85 DEG C DECOMP RAPIDLY IN THE PRESENCE OF THE SODIUM HYDROXIDE RESULTING IN OVERFLOW OF TANK & EVOLUTION OF CONSIDERABLE AMOUNT OF HEAT. \*\*PEER REVIEWED\*\* [National Fire Protection Association. Fire Protection Guide on Hazardous Materials. 9th ed. Boston, MA: National Fire Protection Association, 1986., p. 491M-195]
4. Much heat is evolved when the solid material is dissolved in water. Therefore, cold water and caution must be used for this process. \*\*PEER REVIEWED\*\* [International Labour Office. Encyclopedia of Occupational Health and Safety. Vols. I&II. Geneva, Switzerland: International Labour Office, 1983. 116]
5. Caustic solutions generate heat when further diluted with water. With concentrations of 40% or greater, the heat generated can raise the temperature above the boiling point, resulting in sporadic, dangerous eruptions of the solution. \*\*PEER REVIEWED\*\* [Kirk-Othmer Encyclopedia of Chemical Technology. 3rd ed., Volumes 1-26. New York, NY: John Wiley and Sons, 1978-1984., p. 1:848]
6. With aluminum, arsenic trioxide, sodium, and arsenate: An aluminum ladder was used (instead of the usual wooden one) to gain access to a tank containing the alkaline arsenical mixture. Hydrogen produced by alkaline reaction on the ladder generated arsine, which poisoned the three workers involved. \*\*PEER REVIEWED\*\* [Bretherick, L. Handbook of Reactive Chemical Hazards. 2nd ed. Boston MA: Butterworths, 1979. 207]
7. With bromine: A bucket containing 25% sodium hydroxide solution was used to catch and neutralize bromine dripping from a leak. Lack of stirring allowed a layer of unreacted bromine to form below the alkali. Many hours later, a violent eruption occurred when the layers were disturbed during disposal operations. Continuous stirring is essential to prevent stratification of slowly reacting, mutually insoluble, liquids. \*\*PEER REVIEWED\*\* [Bretherick, L. Handbook of Reactive Chemical Hazards. 2nd ed. Boston MA: Butterworths, 1979. 267]
8. With octanol and diborane: Addition of sodium hydroxide solution during work-up of a reaction mixture of oxime and diborane in tetrahydrofuran is very exothermic, a mild explosion being noted on one occasion. \*\*PEER REVIEWED\*\* [Bretherick, L. Handbook of Reactive Chemical Hazards. 2nd ed. Boston MA: Butterworths, 1979. 632]
9. With 4-methyl-2-nitrophenol, sodium carbonate, and methanol: Failure to agitate a large-scale mixture of the reagents caused an eruption due to exothermic action when mixing occurred. \*\*PEER REVIEWED\*\* [Bretherick, L. Handbook of Reactive Chemical Hazards. 2nd ed. Boston MA: Butterworths, 1979. 632]
10. With zinc: Accidental contamination of a metal scoop with flake sodium hydroxide, prior to its use with zinc dust, caused ignition of the latter. A stiff paste prepared from

zinc dust and 10% sodium hydroxide solution attains a temperature above 100 deg C after exposure to air for 15 min. \*\*PEER REVIEWED\*\* [Bretherick, L. Handbook of Reactive Chemical Hazards. 2nd ed. Boston MA: Butterworths, 1979. 1164

11. With zinc and 4-methyl-2-nitrophenol: In preparation of 2,2-dimethoxyazoxybenzene, solvent ethanol was distilled out of the mixture of o-nitroanisole, zinc and sodium hydroxide, before reaction was complete. The exothermic reaction continued unmoderated, and finally exploded. \*\*PEER REVIEWED\*\* [Bretherick, L. Handbook of Reactive Chemical Hazards. 2nd ed. Boston MA: Butterworths, 1979. 633
12. With 2,2,2-trichloroethanol: Accidental contact of 50% sodium hydroxide solution with residual trichloroethanol in a pump caused an explosion. This was confirmed in laboratory experiments. Chlorohydroxyacetylene, the isomeric chloroketene or chlorooxirene, may have been formed by elimination of hydrogen chloride. \*\*PEER REVIEWED\*\* [Bretherick, L. Handbook of Reactive Chemical Hazards. 2nd ed. Boston MA: Butterworths, 1979. 361
13. Water; acids; flammable liquids, organic halogens; metals such as aluminum, tin, & zinc; nitromethane [Note: Corrosive to metals]. \*\*QC REVIEWED\*\* [NIOSH. NIOSH Pocket Guide to Chemical Hazards. DHHS (NIOSH) Publication No. 94-116. Washington, D.C.: U.S. Government Printing Office, June 1994. 284

**MONSANTO CO. - J. F. QUEENY PLANT**  
**CONTAINER STORAGE LOT**  
**WEEKLY INSPECTION REPORT**

STARTING DATE: 3-11-96

ENDING DATE: 5-20-96

DATE/ TIME	LEAKAGE/ SPILLS OBSERVED		PROPER FITTING LIDS		PROPER LABELS/ DATE		SIGNS OF DRUMS & FLOOR DETERIORATION		POST- SHIPMENT DOCK INSPC.	LIQUID DRUMS [110 MAX.]	PROBLEMS ACTION COMMENTS	CHECK INCOMPATIBLE WASTE OVERPAK		SIGNATURE
	Yes	No	Yes	No	Yes	No	Yes	No				Yes	No	
7:45 AM 3-11-96		✓	✓		✓			✓		69				Richard Kenney
3-13-96									OK 9:30 AM					Richard Kenney
10:30 AM 3-19-96		✓	✓		✓			✓		3				Christopher C. Brown
7:00 AM 3-25-96		✓	✓		✓			✓		3				Richard Kenney
3-26-96											Drained rain water after checking for leaks			Richard Kenney
3-27-96									OK 9:00 PM					Richard Kenney
8:45 AM 4-1-96		✓	✓		✓			✓		22	Drained rain water after checking for leaks			Richard Kenney
8:00 AM 4-8-96		✓	✓		✓			✓		30				Richard Kenney
4-10-96									OK 9:30 AM					Richard Kenney
4-12-96									9:15 AM OK					Richard Kenney
6:45 AM 4-15-96		✓	✓		✓			✓		7				Richard Kenney
4-16-96									OK 3:30 PM					Richard Kenney
7:10 AM 4-22-96		✓	✓		✓			✓		23	Drained rain water after checking for leaks			Richard Kenney
7:10 AM 4-29-96		✓	✓		✓			✓		41	Drained rain water after checking for leaks			Richard Kenney
8:00 AM 5-6-96		✓	✓		✓			✓		98	Drained rain water after checking for leaks			Richard Kenney
9:10 AM 5-8-96									OK 9:30 AM					Richard Kenney
7:30 AM 5-13-96		✓	✓		✓			✓		17	Drained rain water after checking for leaks			Richard Kenney
6:50 AM 5-26-96		✓	✓		✓			✓		38				Richard Kenney

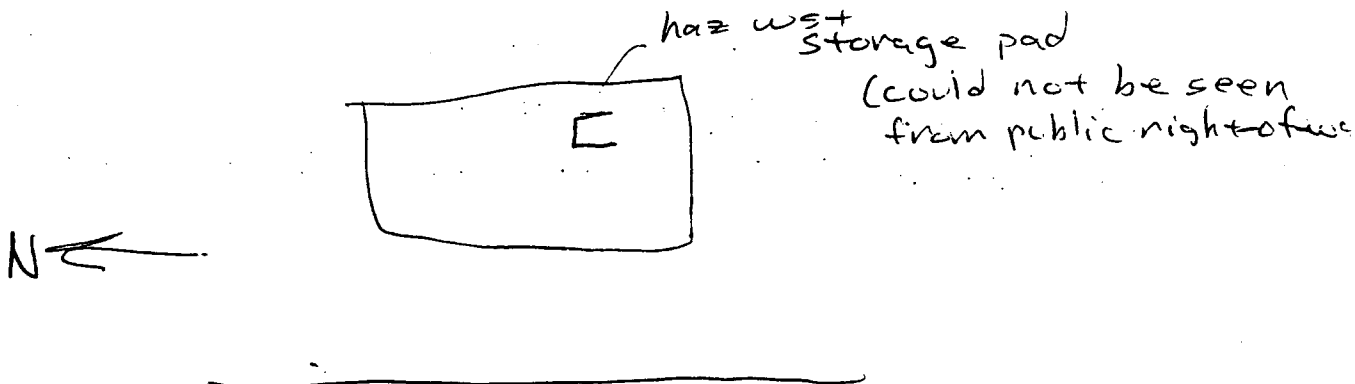
Activity #: \_\_\_\_\_

Monsanto-Queen  
St. Louis, MODRIVE-BY WORKSHEET

Page \_\_\_\_ of \_\_\_\_

5/20/97

1. Arrival time: 29:30 am
2. Drive-by conducted from public right-of-way? ☒ YES ☐ NO
3. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way).



4. Obvious concerns visible from public right-of-way? ☐ YES ☒ NO  
(Note area(s) of concern)

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Containers      | <input type="checkbox"/> Tanks               | <input type="checkbox"/> Processing Equipment |
| <input type="checkbox"/> Loading Areas   | <input type="checkbox"/> Unloading Areas     | <input type="checkbox"/> Security Devices     |
| <input type="checkbox"/> Open Drums      | <input type="checkbox"/> Stressed Vegetation | <input type="checkbox"/> Unusual Staining     |
| <input type="checkbox"/> Unusual Odors   | <input type="checkbox"/> Obvious Discharges  | <input type="checkbox"/> Improper Disposal    |
| <input type="checkbox"/> Safety Concerns | <input type="checkbox"/> Other Concerns      |   |

5. Notes/Observations: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

5. Photo's Taken? ☐ YES ☒ NO

Photo Numbers: \_\_\_\_\_  
(note location/direction on sketch)

DOCUMENTATION: HOW are the facts known? WHO said what? WHEN did it happen?  
HOW long did it happen? and WHAT PROOF WAS OBTAINED?

Activity #: \_\_\_\_\_

Page \_\_\_\_ of \_\_\_\_

SITE ENTRY AND INBRIEFING WORKSHEET

## 1. Initial entry procedures:

☒ Used main entrance☒ Entered during normal operating hours2. Facility Representative(s): Robert CheeverTitle: JFQ & Solid WasteRich Koenig KoenigTitle: Envr. Technician

Title: \_\_\_\_\_

3. Does the facility representative(s) have intimate knowledge of all aspects of the waste generation and management practices? ☐ YES ☐ NO  
(How was this verified?)

4. How long has facility representative worked in their position?

5. Were unreasonable or excessive delays encountered (>15 minutes): ☒ YES ☐ NO  
All managers were in meeting when first arrived (~10 min)  
Waiting for Technician to arrive who was out in plant preparing to take industrial  
hydrogen samples.

## 6. Introduction:

☒ Presented credentials☒ Verified presence at correct facility (checked address/I.D. #)☒ Explained authority to conduct inspection (Section 3007 of RCRA)☒ Explained the purpose, scope, and order of the inspection☒ Explained documentation process through the use of worksheets, checklists, photo's, notes, statements, etc.☒ Explained EPA's need to collect and the facilities responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility☒ Explained facility's right to claim CBI and provided pages 1 and 2 of CBI form for signatures☒ Identified personal safety considerations: \_\_\_\_\_☒ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ7. Was full access granted? ☒ YES By who? (name): \_\_\_\_\_☐ NO Obtain name of person denying access, time of denial, reason for denial, or note limitations placed on access: \_\_\_\_\_

DOCUMENTATION:	HOW are the facts known?	WHO said what?	WHEN did it happen?
	HOW long did it happen?	and WHAT PROOF WAS OBTAINED?	



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
HAZARDOUS WASTE PROGRAM  
LARGE QUANTITY GENERATOR  
**INSPECTION RECORD AND CHECKLIST**

L

LOG-INSP.

OR FACILITIES THAT GENERATE/ACCUMULATE > 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME <b>Monsanto - Queeny</b>	DATE <b>5/20/97</b>	EPA I.D. NUMBER
ADDRESS <b>(see report)</b>	RR NO.	MO I.D. NUMBER
CITY	NUMBER OF EMPLOYEES	YEARS AT SITE
		TELEPHONE NUMBER

FACILITY REPRESENTATIVE(S), TITLE(S)

**DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT.**

**WASTE STREAMS**

DESCRIBE EACH WASTE STREAM GENERATED  
INCLUDING THE PRODUCTION PROCESS

GENERATION  
RATE

EPA ID  
NUMBER

DISPOSITION

1.

2.

3.

4.

5.

**CHECK ALL THAT APPLY (Specify if possible)**

- ☐ NPDES Permit
- ☐ Septic Tank
- ☐ Air Permit

- ☐ Lead/Acid Batteries
- ☐ H.W. Burner/Blender/Marketer
- ☐ Precious Metal Reclamation

- ☐ POTW
- ☐ Solid Waste Landfill
- ☐ Waste Water Pretreatment

**A. GENERAL**

1. ☒ Registered as a HW Generator - Section 260.380.1(1) RSMo and 10 CSR 25-5.262(2)(A)
2. ☒ Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34
3. ☒ Utilizes a licensed hazardous waste transporter - Section 260.380.1(5) RSMo
4. ☒ Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo
5. ☒ Facility does not operate as a TSD - Section 260.390(1) RSMo

**COMMENTS****PART 1: WALK-THROUGH INSPECTION****B. PRETRANSPORT, CONTAINERIZATION & STORAGE**

1. ☒ Storage does not exceed 90 days or 180/270 days if facility generates < 1000 Kg/month - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)
2. ☐ Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.171
3. ☒ Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.172
4. ☒ Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.173(a)
5. ☒ Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.177(c)
6. ☒ Container storage areas have a containment system if holding more than 1000 Kg of liquid hazardous waste - 10 CSR 25-5.262(2)(C)2.B.(I)
7. ☒ Base of containment system is impervious and free of cracks or gaps - 10 CSR 25-5.262(2)(C)2.B.(III)(a)
8. ☒ Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(III)(b)
9. ☒ Capacity of containment system = 10% of waste volume or volume of largest container, whichever is greater - 10 CSR 25-5.262(2)(C)2.B.(III)(c)
10. ☒ Run-on onto the containment system is prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.B.(III)(d)
11. ☒ Accumulated liquids removed to prevent overflow of containment - 10 CSR 25-5.262(2)(C)2.B.(III)(e)
12. ☒ Containers of ignitable or reactive waste stored > 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262(2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265(2)(I)7. and 8.
13. ☒ Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)
14. ☒ Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262(2)(C)1.
15. ☒ Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(2)
16. ☒ Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(II) referencing 40 CFR 265.174
17. ☒ Daily inspection of areas subject to spills, i.e., waste handling areas - 10 CSR 25-5.262(2)(C)2.A.(II)
18. ☒ Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.35
19. ☐ Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33
20. ☒ "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D.(II)
21. ☒ Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)

**COMMENTS**

2 drums slightly dented, discussed with Mr. Koenig to be aware of dents and selecting all around good condition drums

across street from storage pad (Facility has designated storage areas)

handle oil as hazardous waste

**C. SATELLITE ACCUMULATION**

1. ☒ Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a)

**COMMENTS**

2. ☒ Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171
3. ☒ Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172
4. ☒ Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)
5. ☒ Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(2)
6. ☒ Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3.
7. ☒ Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.

## COMMENTS

## D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. ☒ Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.31
2. ☒ Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) - 10 CSR 25-5.262 (2)(C)2.E.
3. ☒ Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(c) & (d)
4. ☒ Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.34(a)
5. ☒ Telephone or two-way radio on-site and capable of summoning local fire or police department - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(b)
6. ☒ Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.33

## COMMENTS

2-way radio

## E. LOG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1.				
2.	No tank storage			
3.				
4.				
5.				

1. ☐ Spill prevention controls in place and operating e.g. check valves, dry discount couplings - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(1)
2. ☐ Overfill prevention controls in place and operating e.g. high level alarms, automatic feed cutoff, etc. - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(2)
3. ☐ Sufficient freeboard in uncovered tanks to prevent overtopping - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(3)
4. ☐ Waste or treatment method compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(a)
5. ☐ Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.199(a)
6. ☐ Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(a)(1) and (2)
7. ☐ Ignitable or reactive wastes treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(b)

## COMMENTS

# COMMENTS

8. ☐ Volatiles with vapor pressure  $> 76 \text{ mm @ } 25^\circ \text{C}$  not placed in open tanks - 10 CSR 25-5.262(2)(C)2.B.(i)
9. ☐ Wastes and residues removed as hazardous waste and tank and equipment decontaminated upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.197(a)
10. ☐ Secondary containment system provided for tanks and equipment installed after July 14, 1986; storing dioxin waste, over 15 years old; of unknown age in facility over 15 years old; repaired, replaced or reinstalled after July 14, 1986 - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a)
11. ☐ Secondary containment system constructed of or lined with impervious waste compatible material - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(1)
12. ☐ Containment system supported by base capable of preventing failure due to settlement, compression or uplift - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(2)
13. ☐ Containment system provided with a leak detection system capable of detecting a release within 24 hours - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(3)
14. ☐ Containment system sloped or designed to drain and remove liquids - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(b)
15. ☐ Containment system capable of containing 100% of the capacity of the largest tank - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(c)
16. ☐ Containment system free of cracks or gaps - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(a)
17. ☐ Run-on onto containment system prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(d)
18. ☐ Spilled or leaked waste and precipitation removed from secondary containment within 24 hours or as soon as possible - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(4)
19. ☐ Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)
20. ☐ Daily inspections of overfill/spill control equipment, aboveground portions of tank system, secondary containment, and data gathered from monitoring equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(a)
21. ☐ Inspection log maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(c)
22. ☐ Cathodic protection systems inspected annually, impressed current sources every two months - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(b)
23. ☐ Detailed written assessment by an independent, qualified, professional engineer for tanks installed after July 14, 1986, prepared and on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.191
24. ☐ Written assessment by an independent, qualified, professional engineer prepared and on-site for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.191
25. ☐ Leak test, internal inspection or tank integrity exam performed annually and documented, by an independent, qualified, professional engineer for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(i)
26. ☐ Leak/spill response resulted in: waste flow stopped immediately; waste removal; containment and removal of visible releases to the environment; notification and report; and repair or closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.196

## PART 2: RECORDS INSPECTION

### F. MANIFESTS

- ☒ Facility uses manifest system - 260.380.1.(6) RSMo; and 10 CSR 25-5.262(2)(B)
- ☒ Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)
- ☒ Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)
- ☒ Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A.
- ☒ Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)2.
- ☒ All transporters' names, phone numbers, MO & EPA I.D.#'s, license plate # - 10 CSR 25-5.262(2)(B)2.
- ☒ Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)2.
- ☒ DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)2.
- ☐ Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2. *in pounds*
- ☒ Manifest signed and dated - 10 CSR 25-5.262(2)(B)2.
- ☒ Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A.
- ☒ Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1.
- ☒ Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C.
- ☒ Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1.

### COMMENTS

### G. LAND DISPOSAL RESTRICTIONS

- ☒ Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)
- ☒ Dilution of waste to meet LDR treatment standards is not occurring - 10 CSR 25-7.268(1) incorporating 40 CFR 268.3(a)
- ☒ "Land-Ban" notification/certification, sent with manifests and retained on-site for five years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)
- ☒ Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)
- ☒ *NPX* Waste analysis plan on-site and utilized if generator treats hazardous waste in tanks or containers to meet LDR treatment standards - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)(4)

### COMMENTS

### H. PERSONNEL TRAINING

- ☒ Personnel are trained to respond to emergencies including the use of alarm systems, emergency equipment and contingency plan - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(3).
- ☒ Employees do not work in unsupervised positions until they have completed the training - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(b)
- ☒ Training reviewed annually - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(c)
- ☒ Program director trained in hazardous waste management procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(2)
- ☒ Personnel training plan on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)

### COMMENTS

*training*  
Monsanto, has a computer program that was made specifically for their facility and includes continuing plan training according to Mr. Koe. Employees go thru the computer program and then takes a test at the end. Monsanto also does a mock drill annually

# Using Part B, Training Plan

6. ☒ Gives job title, job description and name of employee filling each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(1) and (2)
7. ☒ Written description of introductory and continuing training that will be given to each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(3)
8. ☒ Documentation of training completed by personnel - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(4)
9. ☒ Records of current personnel maintained until facility closure, former employee records maintained for at least three years - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(e)

## COMMENTS

On computer, I advised Mr. Kopp to have a signed statement / she also

## I. CONTINGENCY PLAN

1. ☒ Contingency plan maintained on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(a).
2. ☒ Plan submitted to local emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(b)
3. ☒ Emergency coordinator on-site or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.55
4. ☒ Plan describes actions personnel must take in response to fires, explosions or other releases of hazardous waste - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(a)
5. ☒ Describes arrangements with emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(c)
6. ☒ Lists names, addresses and phone numbers (home and office) of emergency coordinators - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)
7. ☒ Primary emergency coordinator designated - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)
8. ☒ List emergency equipment including description, location and capabilities - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e)
9. ☒ Evacuation plan, if applicable, designates primary and secondary routes and evacuation signal - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(f)

## COMMENTS

In process of updating due to the new changes taking place as discussed in report. Currently using what is in Part B Application

## J. WASTE OIL

1. ☐ Waste oil is managed properly and not disposed of into the environment - 10 CSR 25-11.010(1)(D).
2. ☐ Listed hazardous waste mixed with waste oil is handled as a hazardous waste - 10 CSR 25-11.010(1)(C)2.
3. ☐ Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)
4. ☐ Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)
5. ☐ Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)

## COMMENTS

Waste oil is handled as a hazardous waste

## K. RESOURCE RECOVERY

1. ☐ RR certification for energy recovery or reclamation of waste oil or hazardous waste on-site - 10 CSR 25-9.020(1)(A)3.
2. ☐ Facility meets the operating conditions of certification - 10 CSR 25-9.020(3)(E)3.
3. ☐ Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E) 1. and 2.
4. ☐ Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.
5. ☐ Facility maintains a written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) & (2) as modified by 10 CSR 25-7.264(2)(E)2.

## COMMENTS

6. <input type="checkbox"/> R2 facility uses an adequate sampling and analysis plan to assess incoming shipments - 10 CSR 25-9.020(3)(C)1.	COMMENTS
7. <input type="checkbox"/> R2 facility maintains a daily log of manifest number, wastes received, disposition of waste and corresponding sampling data - 10 CSR 25-9.020(3)(C)2.	
8. <input type="checkbox"/> R2 facility has a written closure plan which meets 40 CFR 264.112 requirements - 10 CSR 25-9.020(3)(C)3.	
9. <input type="checkbox"/> R2 facility provides financial assurance for closure - 10 CSR 25-9.020(3)(C)4.	

#### CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

#### COMMENTS

INSPECTOR'S SIGNATURE

*Dedrick Newsome*

DATE

5/20/97

# PHOTO LOG

Monsanto - Queeny 5/20/97  
St. Louis, MO

PHOTO \_\_\_\_\_

Hazardous waste container storage pad with drums of hazardous and non-hazardous waste being stored. Crack on west side of pad shown on left side of photo.

D. Newsome

Monsanto - Queeny 5/20/97  
St. Louis, MO

PHOTO \_\_\_\_\_

Crack in hazardous waste container storage pad

D. Newsome

Monsanto - Queeny 5/20/97  
St. Louis, MO

PHOTO \_\_\_\_\_

Crack in hazardous waste container storage pad

D. Newsome

Monsanto - Queeny 5/20/97  
St. Louis, MO

PHOTO \_\_\_\_\_

Crack in hazardous waste container storage pad

D. Newsome

Monsanto - Queeny 5/20/97  
St. Louis, MO

PHOTO \_\_\_\_\_

Crack in hazardous waste container storage pad (Close-up of photo \_\_\_\_\_)

D. Newsome



Monsanto - Queeny  
St. Louis, MO

5/20/97

**PHOTO** 1

Hazardous waste container storage pad with drums of hazardous and non-hazardous waste being stored. Crack on west side of pad shown on left side of photo.

D. Newsome





Monsanto - Queeny  
St. Louis, MO

5/20/97

PHOTO

2

Crack in hazardous waste container storage pad

D. Newsome





Monsanto - Queeny  
St. Louis, MO

5/20/97

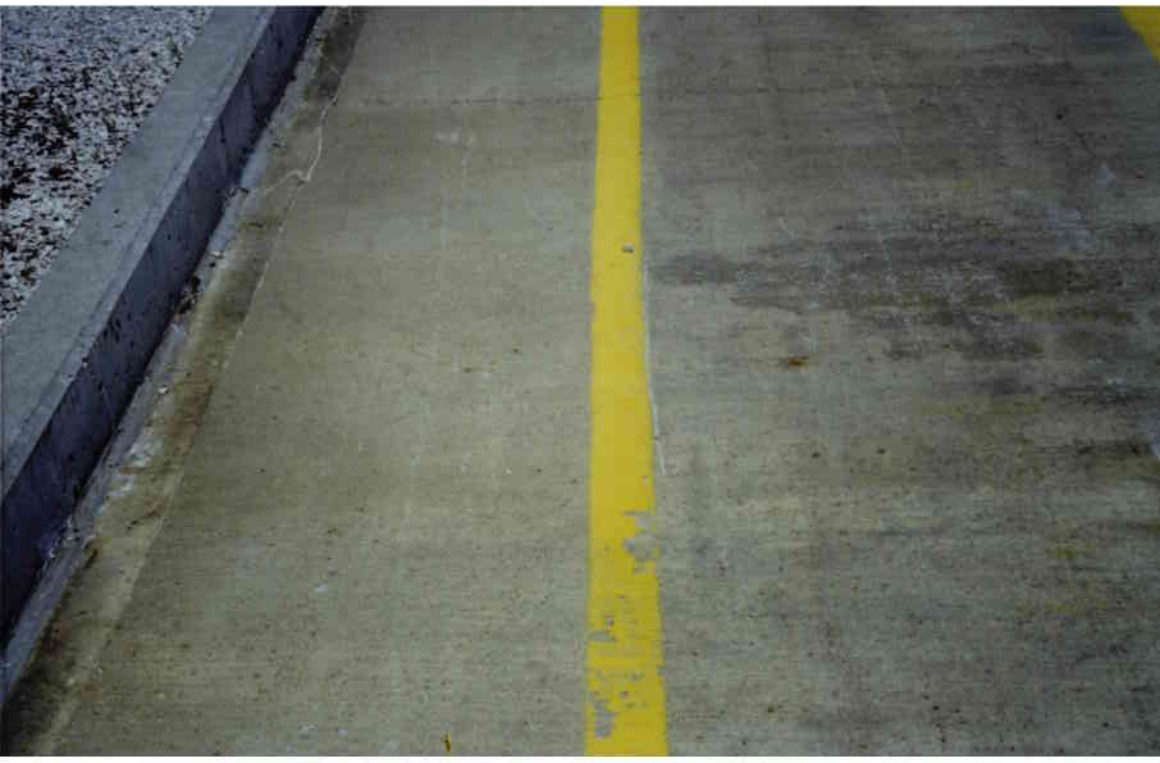
**PHOTO**

3

Crack in hazardous waste container storage pad

D. Newsome





Monsanto - Queeny  
St. Louis, MO

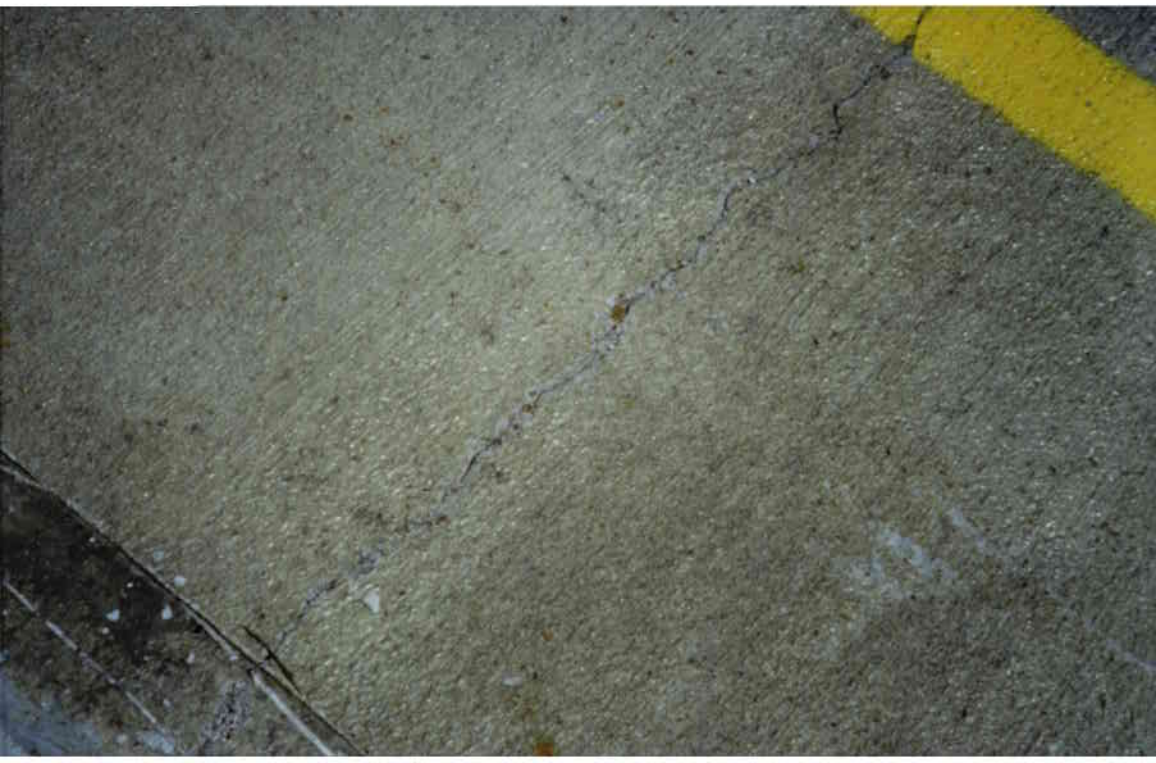
5/20/97

**PHOTO**

4

Crack in hazardous waste container storage pad

D. Newsome *DDN*



Monsanto - Queeny 5/20/97  
St. Louis, MO

PHOTO 5

Crack in hazardous waste container storage pad (Close-up of  
photo 4)

D. Newsome 